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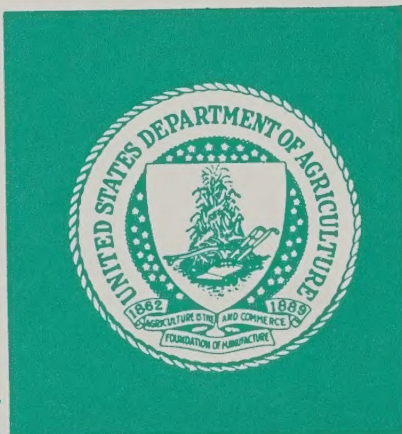
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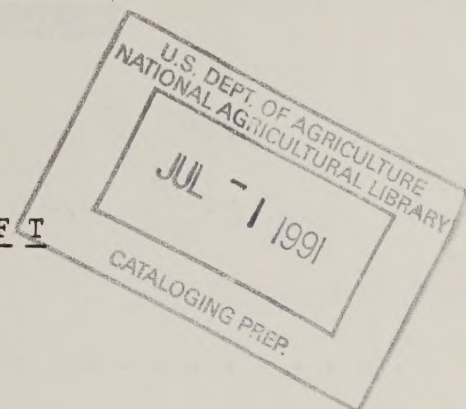
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Assessment of Ethylenebisdithiocarbamate (EBDC)

Fungicide Uses In Agriculture

USDA/State/EPA Assessment Team

Part I: An Analysis of Uses and Their

Relationship to Exposure

by

The EBDC Fungicide Assessment Team of the
National Agricultural Pesticide Impact Assessment Program

United States Department of Agriculture

Coordinated by the Office of Environmental

Quality Activities, USDA

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OVERALL SUMMARY AND CONCLUSIONS

The ethylenebisdithiocarbamates (EBDC's) are a class of fungicides which includes nabam, maneb, mancozeb, zineb, metiram, and diammonium EBDC. They provide control of a broad range of diseases such as blights, blotches, downy mildews, molds, rots, rusts, anthracnose and other fungus incited diseases. Their use amounts to about 22% of the fungicides used in the United States and 57% of the fungicides used in the world.

Since their introduction in the United States in the mid-1940's, major uses have been developed in all areas of agricultural crop production. The highest volume uses occur in vegetable crop disease control, especially potatoes and tomatoes. There are many uses of EBC's for which no acceptable alternatives exist. These uses often needed to continue production of 'minor' or 'speciality' crops.

Although a variety of fungicides have been developed since the introduction of the EBDC's, EBDC's continue to be widely used. This is because they are effective against a broad spectrum of pathogens on any given crop, they do not promote pathogen resistance to fungicides, they are relatively non-phytotoxic, and are inexpensive.

The detailed analysis of the benefits of use and the impact on agriculture in the event the EBDC's become unavailable will be discussed in part two of this assessment report. An overview of uses is given here relative to the analysis of EBDC and ETU residues in

1
2 the diet and to the discussion of the transformation of the mate-
3 rials in biological and nonbiological systems. An identification of
4 data gaps and research needs to more critically evaluate the bene-
5 fits of EBDC uses will also be made in our benefits analysis.
6

7 With respect to EBDC residue exposure levels, we find the cal-
8 culated estimate of 0.000129 mg/kg of body weight is a more real-
9 istic value than the 0.0608 mg/kg estimate cited in the EPA EBDC
10 RPAR notice. This value is well below the FAO/WHO recommended
11 temporary acceptable daily intake of 0.005 mg/kg of body weight.
12 Our calculated total ETU exposure including residues on crop sur-
13 faces and stoichiometric conversion from EBDC is 0.000059 mg/kg of
14 body weight, much less than the estimate cited in the RPAR.
15

16 The basis for the difference between our estimates and the
17 EPA's lies in our use of assumptions which more nearly reflect
18 current agricultural production and consumer practices than those
19 traditionally employed by EPA. In addition, certain redundancies
20 entered into the EPA calculations on which the RPAR decision was
21 based, have been eliminated here.
22

23 Exposure levels can be most accurately determined on the basis
24 of residues found on fresh and processed food items from the retail
25 market, and from fresh food items cooked before consumption.
26
27

Introduction

Definition and Some Chemical Properties of EBDC Fungicides

EBDC (ethylenebisdithiocarbamate) refers to a class of fungicides which includes nabam (Dithane D-14), maneb (Dithane M-22, Manzate), mancozeb (Dithane M-45, Manzate 200), zineb (Dithane Z-78), metiram (a mixture of Zinc NH_4 and ZnSDC) (Polyram), and diammonium EDBC (Amobam). Table 1 gives those names accepted for use in the ingredient statement on pesticide products as required by FIFRA regulations. Each is based on dithiocarbamic acid. They are used extensively in agriculture—on many fruits, vegetables and field crops, turfgrass, seeds, etc.—for the control of blights, blotches, mildews, molds, rots, rusts, and other fungus-incited diseases. There are 206 chemical companies listed as registrants in current EPA files. There are 876 products containing EBDC fungicides currently registered. Domestic producers include DuPont, FMC, Pennwalt, Roberts Chemical and Rohm and Haas. EBDC products are also manufactured in other countries and some are imported into the United States.

Zineb can be produced commercially by reaction of ethylenediamine (EDA) with CS_2 in the presence of alkali followed by precipitation of zineb with addition of zinc sulfate (IARC, 1976). Zineb can also be made, as is rarely done in the field, by mixing nabam or Amobam[®] with zinc sulfate (IARC, 1976). The preparation of

maneb is analogous to that of zineb that manganese sulfate is used in place of zinc sulfate for its precipitation (IARS, 1976). Mancozeb can be prepared from an aqueous slurry of maneb and a water-soluble zinc salt (U.S. Patent Office). Amobam[®] and nabam are also made by reaction of EDZ and CS₂ in the presence of either NH₃ to yield and diammonium EBDC or NaOH to yield the disodium EBDC (Melnikov, 1971). Metiram is made by reaction of EDA and CS₂ in the presence of zinc oxide and hydrogen peroxide (H₂O₂) or by oxidation of an aqueous solution of nabam with H₂O₂ followed by precipitation with zinc sulfate (Melnikov, 1971).

The chemistry of the EBDC's is complicated by their instability and their propensity to form polymers, especially in the presence of certain ubiquitous metallic ions. They are subject to a manifold degradation which begins with production and continues with storage and application (Engst and Schnaak, 1974). Important factors influencing chemical degradation are presence of oxygen, humidity, temperature, and pH (Engst and Schaak, 1974). A number of common degradation products have been identified and will be discussed later in this report. While all of these and other degradation products can result from EBDC degradation, the relative proportions of them do appear to be different for the individual EBDC's. Ethyl-²enethiourea (ETU) appears to be the dominant degradation product of zineb, whereas nabam and maneb yield a larger proportion of ethyl-enebisdiisothiocyanato sulfide (EBIS) (Engst and Schnaak, 1974).

Summary of Points Triggering a Rebuttable Presumption Against Reregistration

The purpose of this report is to analyze the exposure risks to EBDC fungicides. According to a study by the U.S. Environmental Protection Agency, the following adverse effects of EBDC's meet or exceed the criteria for issuance of a rebuttable presumption against registration (RPAR).

A. Hazard to Wildlife: Aquatic Organisms

Section 162.11(a)(3)(i)(B)(3) specifies that a rebuttable presumption shall arise against pesticide's use for direct application to water if such use would result in concentrations in a 6-inch layer of water more than one-half the acute LC₅₀ for aquatic organisms likely to be exposed. Data appear to indicate that pesticide products containing maneb or zineb labelled for use against cranberry fruit rot at an application rate of up to 6 pounds active ingredient per acre may exceed these criteria.

B. Oncogenic Effects in Test Animals

40 CFR Section 162.11(a)(3)(ii)(A) provides that a rebuttable presumption shall arise if a pesticide's ingredient(s), metabolite(s), or degradation product(s) induce(s) "oncogenic effects in experimental mammalian species or in man as a result of oral, inhalation or dermal exposure." 40 CFR Section 162.3 (bb)

1 defines the term "oncogenic" as "the Property of a substance or a
2 mixture of substances to produce or induce benign or malignant tumor
3 formation in living animals." The EPA Carcinogen Assessment Group
4 (CAG) has reviewed the studies and concluded that "oral administra-
5 tion of maneb significantly increased the incidence of benign tumors
6 of the lung in one strain of mouse" (Albert, 1977).

8 ETU, a degradation product and metabolite common to all the
9 EBDC's, is oncogenic in mice and rats. CAG concluded that ETU
10 "induced highly significant incidences of tumors of the liver in
11 males and females of mice. There also were significant increases in
12 tumors at all sites, but this was essentially due to the increases
13 in liver tumors" (Albert, 1977).

15 CAG also concluded that ETU "increased significantly the
16 frequency of thyroid cancers in two different studies on rats"
17 (Albert, 1977).

19 On the basis of five studies, the Working Group of EPA con-
20 cluded that the evidence that long-term oral administration of EBDC's
21 or ETU is oncogenic in mice and rats supports the issuance of an
22 RPAR.

24 C. Teratogenic Effects in Test Animals

26 40 CFR Section 162.11(a)(3)(ii)(B) provides that "A re-
27 buttable presumption shall arise if a pesticide's ingredient(s),

1 metabolite(s), or degradation product(s) produces any other chronic
2 or delayed toxic effect in test animals at any dosage up to a level,
3 as determined by the Administrator, which is substantially higher
4 than that to which humans can reasonably be anticipated to be
5 exposed, taking into account ample margins of safety."

6
7 In determining whether an ample margin of safety exists to
8 protect humans from teratogenic effects of ETU, the Working Group
9 took into account the following factors:

- 10
11 (1) Tolerances exist for EBDC's on many different
12 crops.
13 (2) EBDC's are converted to ETU with cooking.
14 (3) There are few data concerning actual intake of EBDC's
15 or ETU in food.

16 The Working Group, therefore, determined that a reasonable approach
17 is to assume that there is stoichiometric conversion of EBDC's to
18 ETU and that the best estimate of daily intake is given by calcula-
19 tion of theoretical daily intake from existing EBDC tolerances. If
20 the EBDC residues are assumed to be at tolerance levels and food
21 factors established by FDA (Lehman, 1962) are used, the theoretical
22 daily human intake of ETU is calculated as 0.02 mg/kg (Beach and
23 Weaner, 1977). If the teratogenic NEL established by Khera (5 mg/kg
24 body weight) is used, the resulting margin of safety is 250 (Beach
25 and Weaner, 1977. The Working Group concludes that the margin of
26 safety is not great enough to protect the population from the
27 teratogenic effects of ETU, and that an RPAR be issued.

1 The Working Group is further concerned that the theoretical
2 daily intake of EBDC's (0.06 mg/kg) exceeds the acceptable daily
3 EBDC intake recommended by FAO/WHO (0.005. mg/kg) by a factor of 12.
4

5 History of EBDC Fungicides

6

7 Up to the late 1930's inorganic fungicides were the only
8 materials widely available to the grower for the protection of
9 agricultural crops from fungal diseases. Of these, Bordeaux
10 mixture, a combination of copper sulfate and lime, was the most
11 versatile. It was widely used since its discovery in 1882 by
12 Millardet in France. It replaced the old sulfur standard on many
13 crops.
14

15 However, Bordeaux mixture suffered several problems. First, it
16 was phytotoxic to the plants on which it was used at the application
17 rates needed for fungicidal activity. It had a corrosive effect on
18 the grower's spray equipment and frequently clogged nozzles. It was
19 difficult to make up, because it entailed rather precise mixing of
20 copper and lime in the spray tank. Finally, it left a heavy and
21 noticable residue on plant surfaces.
22

23 Aside from the copper compounds, the only other fungicides
24 available in the early 1940's were lime-sulfur, sulfur dust, and the
25 wettable sulfurs which were used on fruit and vegetable crops for
26 scab and crown rot and powdery mildews, and inorganic mercurial
27

1 compounds which were used in the seed treatment of grain. Sulfur is
2 still widely used today, especially to control powdery mildews.
3

4 Because of World War II, which placed a high priority on copper
5 and mercury, there appeared a great demand for adequate substitute
6 fungicides. The first derivative of a dithiocarbamate to achieve
7 prominence was tetramethyithiuram disulfide, later called thiram.
8 Next came the metal salts of dithiocarbamic acid.
9

10 The first reports of the metal salts of dithiocarbamic acid as
11 successful field fungicides appeared in 1942 (Anderson, 1942;
12 Kincaid, 1942) when it was reported that ferric dimethyldithiocar-
13 bamate (ferbam) successfully controlled downy mildew on tobacco on
14 seed beds. In comparison with the old recommendations of 12-16 lbs
15 of sulfur per 100 gallons of spray, the use of ferbam at 1-1/2 lb
16 per 100 gallons seemed strikingly effective. Its potential for crop
17 injury was much less than that of the copper sprays or sulfur,
18 although it left an unsightly black residue on plant surfaces.
19

20 The promising control of early blight and anthracnose on
21 tomatoes and early blight on potatoes achieved with zinc dimethyl-
22 dithiocarbamate (ziram) was reported in 1944 (Heuberger and
23 Wolfenbarger, 1944; Wilson, 1944).
24

25 Disodium ethylenebisdithiocarbamate (nabam) appeared in 1943
26 (Dimond, et al., 1943). Instability of nabam was a problem until
27 the stabilizing effect of adding zinc sulfate to the spray tank was

1 discovered. From then on its progress was rapid, and it became
2 widely used for many vegetable diseases. The next step naturally
3 followed - the manufacture of zinc ethylenebisdithiocarbamate
4 itself, known as zineb. It became commercially available in the mid
5 1940's and was eventually developed for use on approximately 65
6 crops for 416 diseases.

7
8 In 1956 manganese ethylenebisdithiocarbamate was field tested
9 on potatoes and later on other vegetable crops. It became known as
10 maneb. It was introduced commercially in the early 1950's. It was
11 similar to zineb in its effectiveness as a fungicidal agent on a
12 number of crops, and better than zineb on many others. It is cur-
13 rently registered for use on 72 crops for 420 diseases. Included
14 are many vegetables, fruits, ornamentals, and seed treatments.

15
16 In the early sixties a coordinated complex of the zinc and
17 manganese salts of ethylenebisdithiocarbamate, named mancozeb, was
18 introduced. It represented an even further improvement in the
19 evolution of EBDC's, combining many of the benefits of zineb and
20 maneb in one product. It is now labelled for use on 51 crops for
21 268 diseases. In addition, it is being tested in many instances for
22 additional uses for which presently available materials are
23 inadequate or for which no other material is labelled for use. Many
24 of these label expansion projects involve "minor or specialty" crops
25 such as ornamentals, tropical fruits, and vegetables. Also many
26 projects are under way involving use of EBDC in combination with
27 another fungicide.

General Qualities and Usefulness of EBDC's

In four years, from the time of its introduction in the mid 1940's, zineb replaced Bordeaux mixture as the standard fungicide on many crops in the United States. Within several more years the EBDC's had replaced Bordeaux, except in special situations, throughout the world. Why did this rapid and wide acceptance of EBDC's occur? Recent compilations by several companies give sales figures of about 27,000,000 lbs in the United States (and 255,000,000 lbs worldwide). This is out of a total of 119 million lbs of fungicides sold in the United States and 460 million lbs sold in the world. Such tremendous acceptance occurred because the EBDC's provided the growers for the first time with a good broad spectrum fungicide with no significant phytotoxic side effects. In addition, Powell and Shurtleff stated that the importance of this group of fungicides is emphasized by the fact that they controlled fungi that heretofore had not been effectively controlled by sulfur or copper compounds (1976). The rust diseases on fruits or ornamentals are good examples. Also, later chapters of this report will show that diseases caused by Botrytis, Septoria, and Alternaria fungi and several anthracnose diseases were more adequately controlled.

For example, the production of potatoes, the most important vegetable in the world, has been increased dramatically since the introduction of EBDC fungicides. While it took the first 45 years of this century to increase the potato yield in the United States some 30% (from 91.8 bu/acre in the period 1901-1905 to 140.9 bu/acre

1
2 in the period 1941-1945), potato yields increased almost 90% in the
3 next nine years (to 268 bu/acre by 1954), (McNew, 1959). EBDC's,
4 along with the introduction of organic insecticides, improved spray-
5 ing techniques, and new fertilizers had a hand in this increase.

6
7 Whereas all of these factors contributed to increased yields,
8 EBDC's may well be the largest single factor. For instance,
9 Heuberger and Manns (1943) reported in a test in Delaware with
10 Dakota Red potatoes a 21% yield gain for nabam (Dithane D-14) plus
11 $ZnSO_4$ plus lime, as compared with the use of Bordeaux mixture
12 (the standard fungicide up to that time). Later on, Heuberger
13 (1946) reported a 32% yield increase on potatoes grown in Delaware
14 and treated with Dithane Z-78 (zineb).

15
16 Heuberger (1967) found in the mid 1940's that EBDC's gave control
17 superior to copper compounds on tomatoes for all five of the common
18 diseases -- the early blight, Stemphylium leaf spot, anthracnose,
19 Septoria leaf spot, and late blight. The EBDC's also increase
20 yields 2-3 tons per acre was a big yield. Yield increases were also
21 reported on cucurbits (25% or more) and celery. Yield increase
22 studies were also conducted by researchers on many crops including
23 apples, corn, small grains, bananas, peanuts, and ornamentals.

24
25 There are no commercial fungicides which have as broad a target
26 spectrum on as many crops as those in the EBDC class. There are
27 substitutes for particular uses on particular commodities, but they

1
2 are often ineffective, more costly, or have more undesirable prop-
3 erties than the EBDC products.
4

5 EBDC's are compatible with most pesticides. This is important
6 when incorporating them in total pest management--or integrated pest
7 management--programs. For instance, in apple production the EBDC's
8 are compatible with spray oils, are compatible with miticides, but
9 are not toxic to the natural predators of the apple mite.
10

11 Finally, EBDC's are useful to combat the plant pathogens that
12 are developing resistance to many of our more specific fungicides.
13 Again, apple protection can serve as an example, where the apple
14 scab fungus has become resistant to other fungicides in many areas.
15 As integrated pest management programs increase in use, the need for
16 growers to use a general fungicide to quickly avert problems due to
17 pathogen resistance will be ever more important.
18
19
20
21
22
23
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26
27

Overview of Uses

Introduction

The EBDC fungicides have been in use for nearly 30 years. Throughout this period, continued research has resulted in more and more uses constantly being added to existing labels. Our examination of current EPA microfiche files indicates that combined totals of all six EBDC compounds amount to 271 crop registrations for 1,296 diseases, divided up among 876 different products registered by 206 different companies (Table 1)!

Because of this extremely diverse and large registered use and product situation, it has been difficult for our assessment team to determine total production and use pictures for the United States. According to Farm Chemical Magazine (September, 1977), dithiocarbamate fungicides accounted for \$50 million of a total \$116 million U.S. fungicide market for 1974. Chemical and Engineering News of September 5, 1977, states that this market is growing by 7.3% per year. Thus, in 1977 the market would be about \$61.75 million. Using this and other confidential sales information, the assessment team estimates that about 27 million pounds of EBDC fungicides are currently being used in this country each year. Our further benefits analysis may change this figure as more information becomes available.

1 Whereas detailed benefits and use information is still being
2 gathered, a brief overview of uses is necessary to more adequately
3 understand the perspective of potential exposure of the general
4 population by the ingestion of EBDC and/or ETU residues. Since
5 registrations occur in almost all areas of agriculture/commodity
6 groupings, a commodity oriented overview will be presented.

7
8 There are several problems with this sort of an overview that
9 could result in misinterpretation of the use situation. For in-
10 stance, there are many uses of EBDC products on so-called "minor"
11 or "speciality" crops. Loss of the uses would be quite serious, for
12 manufacturers will likely be unwilling to go through the lengthy
13 testing and registration process for a new product which would be
14 sold only in small quantities. An example is the registration of
15 zineb for the control of pathogenic fungi on mushrooms.

16
17 Furthermore, generalized usage pictures do not adequately take
18 into account regionalization. For instance, mancozeb is considered
19 essential on grapes in Missouri because of downy mildew. Areas
20 without downy mildew, such as the large grape producing States of
21 California or New York, do not list mancozeb as an essential use.
22 Again, this creates a "minor" use, but here it is on a major crop.

23
24 Generalized use overviews do not bring out the fact that minor
25 disease problems often become major because of shifts in crops vari-
26 eties, cultural practices, climatic or weather changes, genetic
27 changes in virulence of pathogens or in resistance of pathogens to

1 fungicides. In some years, only 10% of the lettuce acreage in New
2 Mexico may be treated with EBDC fungicides. However, 100% of the
3 acreage may be treated in some years in order to protect the crop
4 from downy mildew! A realistic estimate of year to year use on
5 lettuce is 25% of the acreages.

6
7 The potential for the occurrence of new diseases or new, more
8 virulent, pathogens is always present. In the early 1970's, maneb
9 was used selectively in the northern corn belt states to prevent
10 leaf blight. Recent years have not been identified as heavy maneb
11 using years on northern grown corn. In this case, use was triggered
12 by the sudden occurrence of a new strain of the southern corn leaf
13 blight fungus. This fungus strain spread northward and attacked
14 previously resistant corn varieties which necessitated the use of
15 maneb. In a few years, growers shifted to varieties of corn
16 resistant to the new strain and the crisis was over.

17 18 Vegetables

19
20 Most of the major EBDC uses occur in the area of vegetable pro-
21 duction. In 1975, it was estimated that uses of dithiocarbamates
22 (of which 91% are EBDC's) covered 43% of the vegetable market even
23 though they represented only about 20% of the total fungicide market
24 for agricultural uses (Chemical and Engineering News, September 5,
25 1977). Table 3 lists the vegetable registrations for the EBDC fungi-
26 cides (35 crops and 163 diseases). Use estimates on a national basis
27 are 7 million pounds of EBDC fungicide per year on an average of 50%

1 of the potato acreage, 3.6 million lbs on 25% of the tomato acreage,
2 and 7 - 9 million lbs of EBDC fungicides used on other vegetables.
3

4 Our team has estimated that about 353 million cwt. of potatoes
5 were produced on about 1.4 million acres in 1976. Thirty-two per-
6 cent of this acreage was east of the Mississippi River and 68% was
7 in the western United States. The results of our survey of potato
8 extension specialists indicated that about 72% of the acreage east
9 of the Mississippi River was sprayed with an EBDC fungicide (pri-
10 marily mancozeb), amounting to about 4 million pounds. In the west,
11 about 50% of the acreage is currently sprayed with about 1.5 mil-
12 lion lbs of mancozeb. Across the country, 50 - 60% of the potato
13 seed pieces are treated with EBDC's, generally as an 8% mancozeb
14 dust.
15

16 This EBDC potato usage protects the crop from two major foliar
17 diseases, Phytophthora late blight and Alternaria early blight.
18 Both of these diseases can occur anywhere in the country depending
19 on weather; however, late blight is usually more severe in the East
20 and early blight is a dangerous Western potato disease. Fungicidal
21 sprays are also suggested for control of Botrytis leaf spot and vine
22 rot. Fungicide seed piece decay, Rhizoctonia stem canker, common
23 scab, Verticillium wilt, and other pathogens that may be carried on
24 the seed tubers.
25

26 The EBDC fungicides are effective in controlling a number of
27 foliar and fruit diseases of tomatoes. The more important diseases

1 are: (1) anthracnose, (2) early blight, (3) late blight, (4) gray
2 leaf spot, and (5) Septoria leaf blight. Control of these diseases
3 can increase yields 20 to 30% in the northeastern states and up to 60%
4 in Florida. It is estimated that the major northern tomato produc-
5 ing states used over 500,000 pounds of EBDC fungicides on approx-
6 imately 35,000 acres in 1977. In Florida, about 1.8 million lbs of
7 EBDC's were used to protect the crop from early blight and late
8 blight in 37,795 acres. For Florida growers, early blight is a
9 persistent disease occurring every season. Since up to 32 applica-
10 tions per year must be made, EBDC (primarily maneb) is the material
11 of choice because it is cheaper than other products. In California,
12 extensive tomato acreage of over 247,000 acres is primarily devoted
13 to processing tomatoes. Disease severity is less there, and only
14 about 11% of the sprayed acreage is treated with EBDC's to control
15 black mold, early blight, and Botrytis mold.

16
17 The most widespread use of EBDC fungicides to protect other
18 vegetable crops from disease occurs in Florida where 5.8 million lbs
19 are used mostly on celery, cucumber, peppers, snap beans, squash,
20 sweet corn, and watermelon. Downy mildew is a serious disease of
21 lima beans in the mid-Atlantic area. Maneb is the only effective
22 fungicide registered on this crop. Downy mildew and Botryis gray
23 mold are diseases of lettuce in California for which 40% of the
24 159,956 acres planted was protected with EBDC fungicides. EBDC's
25 are also used in moderate amounts in the western states on cucur-
26 bits, onions, carrots, celery, broccoli, spinach, cauliflower,
27 and cabbage. Another western use of EBDC's is for downy mildew

control on hops. This only represents 44,000 lbs of EBDC on 8500 acres, but it is an essential use to control a serious disease.

Fruits

Our assessment team estimates that about 4.2 million lbs of EBDC fungicides are used on fruits for the 75 diseases on the 24 crops listed in Table 3. The majority of the use is on apples, where EBDC's are registered for control of 19 diseases. In the northern states, apple scab is the major disease. Scab, powdery mildew, rusts, and fruit rots are the diseases most commonly found in the mid-Atlantic and mid-Western states. EBDC's are preferred here because of economical broad spectrum control, acceptable fruit finish, and compatibility with dinocap for powdery mildew control. EBDC's are well suited to integrated mite control programs in these areas because of safety to the beetle predator and predatory mites. They are also compatible with spray oils. In the Southeastern states, major apple disease problems are fruit rots, scab, rust, and powdery mildew. In some southern areas, EBDC's are the only materials presently available to control the fruit rots. In all areas, EBDC's are relied upon to control strains of the apple scab fungus which have become resistant to alternative fungicides, mainly benomyl and dodine. Up to 90% of the apple acreage in some eastern states may be treated with EBDC's, but very little western apple acreage is treated.

Information on other EBDC fruit uses is still being gathered. Important uses appear to be for black knot control on plums and prunes in the Northeast, peach rust in South Carolina, fruit rot on grapes in the Southeast, and for diseases of pears, raspberries, and cranberries.

Field Crops

About 2 million pounds of EBDC fungicides are used on the wheat and barley cereal crops in the United States each year. These are used for foliar disease protection (0.7 million lbs) and for seed treatment (1.2 million lbs). Seed treatment is the practice of using a fungicide coating of the seed to protect the seed from invasion by fungi and bacteria which results in damping-off or seedling blight. The use of EBDC's as a seed treatment is largely confined to the States of Montana, North Dakota, South Dakota, and Minnesota, where wheat seed treatment has resulted in 4.1 bushels per acre of increased yield because of an increased plant stand of 26.9%. Additionally, over 1 million acres of winter wheat in Indiana and Kansas are planted to EBDC treated seed.

EBDC fungicides are beginning to be used to protect cereal crops from diseases such as leaf rust, Septoria leaf blotch, net blotch, spot blotch, and brown spot. The acreage treated varies from year to year depending on the crop value. In 1975, Minnesota farmers treated about 1 million acres. In 1976, more than 400,000 acres of winter wheat were treated in Missouri. North Dakota

1 research on wheat has demonstrated 28% yield increases over 4 years
2 of test results with EBDC spray programs.

3
4 Other field crops on which EBDC's are used include cotton for
5 rust control in Arizona. This is a locally serious disease for
6 which there are no alternative fungicides. EBDC fungicides are used
7 extensively in the peanut disease control programs in North Caro-
8 lina, Oklahoma, Texas, and Virginia. Approximately 3 million lbs
9 were applied to about 275,000 acres in 1977. In Minnesota, EBDC's
10 are essential to control Helminthosporium leaf spot on the 23,000
11 acres of wild rice grown in that State each year.

12 13 Mushrooms

14
15 In the United States, mushrooms are produced on 117.7 million
16 square feet of commercial beds (2737 "acres"), primarily in Califor-
17 nia and Pennsylvania. Zineb is applied to more than 60% of the beds
18 to control Verticillium dry bubble and other fungus diseases which
19 spot the mushrooms. There is no viable alternative material avail-
20 able for these uses on this high value crop.

21 22 Turf

23
24 Turfgrasses have become the major ground cover plants for most
25 of the suburban and urban United States. Rising quality standards
26 in recent years have contributed to the importance of disease con-
27 trol. Table 4 lists the uses of EBDC fungicides in this area.

1 There are hundreds of products labelled for turf disease control
2 that contain one of these EBDC fungicides. Grass seed production
3 also involves use of these compounds.
4

5 Important diseases of turfgrasses that EBDC's are used for
6 include the Helminthosporium leaf spots and melting outs (declines),
7 Rhizoctonia blight or brown patch, and Pythium seedling diseases and
8 blight. Our team estimates that at least 0.65 million lbs of EBDC's
9 (primarily maneb) are used to control these diseases. They are
10 preferred because of their low cost and wide availability. Addi-
11 tionally, they are used to combat the fungicide resistance to
12 alternatives that is now appearing in many areas.
13

14 Ornamentals

15

16 Tables 5 and 6 list some uses of EBDC fungicides for diseases
17 of ornamental plants. A most significant part of the EBDC fungicide
18 use picture in ornamentals is that they can be used to counter the
19 myriad of severe but minor disease problems that may occur in a
20 nursery, greenhouse, or ornamental planting, even though specific
21 plant/disease labelling may be lacking. As in turf, total use esti-
22 mates are difficult because of the many products on the market.
23

24 Most commercial use of EBDC's on ornamentals is in Florida,
25 where mancozeb is used to control many diseases of foliage plants.
26 Much of the chrysanthemum acreage in Florida is also sprayed with
27 EBDC's. Other flower crops in which EBDC's are used include

gladiolus, carnations, and bulb crops (tulips, lilies, etc.). On woody plants, zineb appears to be the most widely used EBDC, with mancozeb use increasing. Azaleas, camellias, crabapples, and roses are examples of commonly treated crops.

Forest Products

The forest industry does not consider it economically feasible to apply protectant fungicides to forest stands. The largest quantity of EBDC fungicide use on a forest product is nabam as a slimicide in the wet end of pulp and paper mills. Precise use figures are not available. Total slimicide use (all fungicide) is around 4 million lbs.

About 150,000 lbs of maneb were used to control needle cast of Christmas trees in 10,000 acres of plantings in the Lake States. A very small amount of maneb is used to control Herpobasidium blight of honeysuckle in windbreak plantings in the Plains States. Finally, about 4,000 acres of tree seedling nurseries are treated with maneb to control needle casts, anthracnose, and leaf spot diseases. Since regeneration of the nation's forests depend upon nursery tree production, such a use is more important than may be realized with casual analysis.

World Use Overview

Although the purpose of this report is to discuss usage of EBDC fungicides with respect to their use in the United States, a brief discussion of worldwide use patterns is necessary for a complete analysis of benefits and risks. The reregistration actions taken by our country will have an impact on agencies in other lands. Nations with less sophisticated risk/benefit analysis mechanisms may not be able to interpret our country's decision if ours are made without any regard to world use patterns.

Whereas we use 25 - 27 million lbs of EBDC fungicides annually in the United States, world use has been estimated at 255 million lbs (1975 figures). Table 8 lists the major use categories and the volumes used that we have estimated for 1975. A major difference between world usage and United States usage in relative importance of use categories is the use of EBDC's on grapes, largely a European use to control downy mildew. Another notable use is that on bananas, where maneb and benomyl are essential to control Sigatoka disease. World use patterns on vegetables and other fruits follow closely those in this country.

Summary and Conclusions

1. Since their introduction in the mid-1940's EBDC fungicides have become the most widely used disease control chemicals in the production of food in the United States and in the World.
2. Major agricultural uses in the United States are in the production of potatoes, tomatoes, other vegetables, apples, and certain cereal grains.
3. Many small volume uses exist for which there are no adequate alternatives. These occur on "speciality" or "minor" crops as well as major crops.
4. EBDC uses are desirable because the fungicides have broad spectrums of activities, do not promote pathogen resistance, are relatively non-phytotoxic, and are inexpensive.
5. A detailed analysis of the benefits of uses will be presented in part two of our assessment report.

Table 1. EBDC Nomenclature
(Source: EPA Position Document 1 on Ethylenebisdithiocarbamates)

Common Name	Label Chemical Name	Trade Name(s)	CAS Name	CAS Number
1. None	Diammonium EBDC	Amobam®	Carbamodithioic acid, 1,2-ethanedithiolbis-, diammonium salt	3566-10-7
2. Mancozeb*	**	Dithane® M-45 Manzate® 200	[[[1,2-Ethanedithiolbis [carbamodithioato]] (2-)]manganese mixture with [[1,2-ethanedithiolbis [carbamodithioato]] (2-)]zinc	8018-01-7
3. Maneb	Manganese EBDC	Manzate® Dithane® M-22	[[[1,2-Ethanedithiolbis [carbamodithioate] (2-)]manganese	12427-38-2
4. Nabam	Disodium EBDC	Parzate® Dithane® D-14	Disodium 1,2-ethanedithiolbis[carbamodithioate]	142-59-6
5. Metiram*	***	Polyram®	Metiram	
6. Zineb	Zinc EBDC	Dithane® Z-78	[[[1,2-Ethanedithiolbis [carbamodithioato]] (2-)]zinc	12122-67-7

* Recognized in Europe but not yet established in the United States. These names will be used in this document for convenience.

** Zinc ion and manganese ethylene bisdithiocarbamate 80%, a coordination product of manganese 16%, zinc 2%, ethylene bisdithiocarbamate 62%.

*** Mixture of 5.2 parts by weight (89.9%) of ammoniates of [ethylenebis(dithiocarbamatgo)]zinc with 1 part by weight (16.1%) ethylenebis[dithiocarbamic acid], bimolecular and trimolecular cyclic anhydrosulfides and disulfides.

Table 2. Total registrations and product summary for EBDC fungicides.

<u>Chemical</u>	<u>Crop</u> <u>Registrations</u>	<u>Number of Diseases</u>	<u>Number of Products*</u>
Diammonium EBDC	21	47	2
Nabam	44	104	51
Mancozeb	51	268	110
Maneb	72	420	306
Zineb	65	416	354
Metiram	<u>18</u>	<u>41</u>	<u>53</u>
Totals	271	1296	876

*Number of separately labelled proprietary formulations, including those containing EBDC's alone or in combination with other pesticides.

Table 3. EBDC Fungicides Registered for Control of Diseases of Vegetables*

Plant	Disease	Registered EBDC
Asparagus	Crown rot	Mancozeb
	Rust	Mancozeb
		Maneb
		Polyram
Beans (field & snap)		Zineb
	Angular leaf spot	Zineb
	Anthracnose	Maneb
		Zineb
	Downy mildew	Maneb
		Zineb
Beans (lima)	Downy mildew	Maneb
	Rust	Maneb
		Zineb
Beets	Anthracnose	Maneb
		Zineb
	Downy mildew	Maneb
		Zineb
Blackeyed beans	Downy mildew	Maneb
		Zineb
	Rust	Zineb
broccoli	Cercospora leaf spot	Zineb
	Downy mildew	Zineb
	Leaf spots	Zineb
	Seed treatment	Zineb
broccoli	Alternaria leaf spot	Maneb
	Downy mildew	Maneb
		Zineb
	Leaf spots	Zineb

*Based on EPA microfische label and registration files.

1	Plant	Disease	Registered EBDC
2			
3	Brussels sprouts	Alternaria leaf spot	Maneb
4		Downy mildew	Maneb
5			Zineb
6		Leaf spot	Zineb
7	Cabbage	Alternaria leaf spot	Maneb
8		Downy mildew	Maneb
9			Zineb
10		Leaf spots	Zineb
11	Cantaloupe	Alternaria leaf spot	Zineb
12		Angular leaf spot	Zineb
13		Anthracnose	Mancozeb
14			Maneb
15			Zineb
16		Blossom blight	Zineb
17		Cercospora leaf spot	Maneb
18		Downy mildew	Mancozeb
19			Maneb
20			Polyram
21			Zineb
22		Gummy stem blight	Mancozeb
23			Maneb
24			Polyram
25			Zineb
26		Scab	Mancozeb
27	Carrot	Alternaria blight	Maneb
			Zineb
		Cercospora blight	Mancozeb ^e
			Maneb [^]
			Zineb

	Plant	Disease	Registered EBDC
1			
2	Cassaba melon	Alternaria leaf spot (blight)	Zineb
3		Angular leaf spot	Zineb
4		Anthracnose	Mancozeb
5			Maneb
6			Zineb
7		Blossom blight	Zineb
8		Cercospora leaf spot	Mancozeb
9			Maneb
10		Downy mildew	Mancozeb
11			Maneb
12			Zineb
13		Gummy stem blight	Mancozeb
14			Maneb
15			Zineb
16		Scab	Mancozeb
17			Zineb
18	Cauliflower	Alternaria leaf spot	Maneb
19		Downy mildew	Maneb
20			Zineb
21		Leaf spot	Zineb
22	Celery	Early blight and late blight (Cercospora and Septoria)	Mancozeb
23			Maneb
24			Polyram
25			Zineb
26	Chinese cabbage	Downy mildew	Zineb
27		Leaf spot	Zineb
28	Collards	Alternaria spot	Maneb
29		Downy mildew	Maneb
30			Zineb
31		Leaf spot	Zineb

1	Plant	Disease	Registered EBDC
2	Corn (sweet)	Helminthosporium leaf blight	Mancozeb
3			Maneb
4			Polyram
5	Crenshaw melons	Alternaria leaf blight	Mancozeb Zineb
6		Angular leaf spot	Zineb
7		Anthracnose	Maneb Zineb
8		Blossom blight	Zineb
9		Cercospora leaf spot	Mancozeb Maneb
10			
11		Downy mildew	Mancozeb Maneb Zineb
12			
13			
14		Gummy stem blight	Mancozeb Maneb Zineb
15		Scab	Mancozeb Zineb
16			
17	Cucumber	Alternaria leaf spot	Mancozeb
18			Maneb
19			Polyram
20			Zineb
21		Angular leaf spot	Maneb
22			Zineb
23			
24		Anthracnose	Mancozeb Maneb Zineb
25		Blossom blight	Zineb
26		Downy mildew	Mancozeb Maneb Polyram Zineb
27			
		Fruit rots	Maneb

1	Plant	Disease	Registered EBDC
2	Cucumber (cont'd.)	Gummy stem blight	Mancozeb
3			Polyram
4			Zineb
5		Scab	Mancozeb
6	Eggplant	Anthracnose	Maneb
7			Zineb
8		Cercospora leaf spot	Zineb
9		Downy mildew	Zineb
10		Early blight (Alternaria)	Maneb
11			Zineb
12		Fruit rots	Zineb
13		Late blight (Phytophthora)	Zineb
14			Zineb
15	Honeydew melons	Alternaria blight	Mancozeb
16			Zineb
17		Angular leaf spot	Zineb
18		Anthracnose	Mancozeb
19			Maneb
20			Zineb
21		Blossom blight	Zineb
22		Cercospora leaf spot	Mancozeb
23			Maneb
24		Downy mildew	Mancozeb
25			Maneb
26			Zineb
27		Gummy stem blight	Mancozeb
			Maneb
			Zineb
		Scab	Mancozeb
			Zineb

1	Plant	Disease	Registered EBDC
2	Kale	Alternaria	Maneb
3		Downy mildew	Maneb Zineb
4		Leaf spot	Zineb
5	<hr/>		
6	Lettuce	Botrytis blight and rot	Zineb
7		Downy mildew	Maneb Zineb
8	<hr/>		
9	Persian melon	Alternaria blight	Mancozeb Zineb
10			
11		Angular leaf spot	Zineb
12		Anthracnose	Mancozeb Maneb Zineb
13			
14		Blossom blight	Zineb
15		Cercospora leaf spot	Mancozeb Maneb
16		Downy mildew	Mancozeb Maneb Zineb
17			
18		Gummy stem blight	Mancozeb Maneb Zineb
19			
20		Leaf spot	Mancozeb Maneb
21			
22		Scab	Zineb
23	<hr/>		
24	Mushroom	Brown spot (Verticillium)	Zineb
25		Cobweb (Dactylium)	Zineb
26		Mildew	Zineb
27		Soft rot	Zineb

	Plant	Disease	Registered EBDC
1	Muskmelon	Alternaria leaf spot	Mancozeb
2			Zineb
3		Angular leaf spot	Zineb
4		Anthraconose	Mancozeb
5			Maneb
6			Zineb
7		Blossom blight	Zineb
8		Cercospora leaf spot	Mancozeb
9			Maneb
10		Downy mildew	Mancozeb
11			Maneb
12	Onion	Gummy stem blight	Mancozeb
13			Maneb
14			Zineb
15		Downy mildew	Mancozeb
16			Maneb
17			Zineb
18		Neck rot	Mancozeb
19		Purple blotch	Mancozeb
20			Maneb
21	Peas	Smut	Zineb
22		Damping off	Zineb
23		Downy mildew	Zineb
24	Potato	Rust	Zineb
25		Early blight	Mancozeb
26			Maneb
27			Polyram
			Mancozeb
			Maneb

1	Plant	Disease	Registered EBDC
2	Potato (cont'd.)	Scab	Mancozeb
3			Polyram
4		Seed piece treatment	Mancozeb
5			Zineb
6	Pumpkin	Alternaria blight	Zineb
7		Angular leaf spot	Maneb
8			Zineb
9		Anthracnose	Zineb
10		Bacterial wilt	Zineb
11		Downy mildew	Maneb
12			Zineb
13	Radish	Gummy stem blight	Zineb
14		Scab	Zineb
15			
16	Spinach	Alternaria leaf spot	Zineb
17		Downy mildew	Zineb
18		Leaf spots	Zineb
19			
20			
21	Squash	Anthracnose	Maneb
22			Zineb
23		Cercospora leaf spot	Maneb
24			Zineb
25		Downy mildew	Maneb
26			Zineb
27		White rust	Maneb
	Squash	Alternaria leaf spot	Mancozeb
			Zineb
		Angular leaf spot	Zineb
		Anthracnose	Mancozeb
			Maneb
			Zineb
		Cercospora leaf spot	Mancozeb

	Plant	Disease	Registered EBDC
1			
2	Squash (cont'd.)	Downy mildew	Mancozeb
3			Maneb
4			Zineb
5		Gummy stem blight	Mancozeb
6			Zineb
7		Pythium fruit rot	Maneb
8		Scab	Mancozeb
9			Zineb
10	Tomato	Anthracnose	Mancozeb
11			Polyram
12			Zineb
13		Bacterial spot	Mancozeb
14			Maneb
15		Black mold (Alternaria)	Mancozeb
16			
17		Early blight	Mancozeb
18			Maneb
19			Polyram
20			Zineb
21		Gray leaf spot (Stemphylium)	Maneb
22			Polyram
23		Gray leaf mold	Mancozeb
24			Zineb
25		Late blight	Mancozeb
26			Maneb
27			Polyram
28			Zineb
29		Nailhead spot	Zineb
30			
31		Septoria leaf spot	Maneb
32			Zineb
33		Southern blight	Zineb
34			
35	Turnip	Downy mildew	Maneb
36			Zineb
37		Leaf spots	Maneb
38			Zineb

Plant	Disease	Registered EBDC
Watermelon	Alternaria leaf spot	Mancozeb
		Maneb
	Angular leaf spot	Zineb
	Anthracnose	Mancozeb
		Maneb
		Zineb
	Blossom blight	Zineb
	Downy mildew	Mancozeb
		Maneb
		Zineb
	Gummy stem blight	Mancozeb
		Maneb
		Zineb
	Leaf spots	Mancozeb
		Maneb
	Scab	Mancozeb
Zineb		

Table 4. EBDC Fungicide Registered for Control of Diseases of Fruits*

Fruit	Disease	Registered EBDC
Apples	Bitter rot	Mancozeb
		Polyram
		Zineb
	Black rot	Maneb
		Polyram
		Zineb
	Blotch	Zineb
	White rot	Polyram
		Zineb
	Brooks spot	Zineb
	Brown rot	Mancozeb
		Polyram
	Bullseye rot	Maneb
	Cedar apple rust	Mancozeb
		Maneb
		Polyram
		Zineb
	Fire blight	Zineb
	Flyspeck	Mancozeb
		Maneb
		Polyram
		Zineb
	Frogeye leaf spot	Zineb
	Quince rust	Zineb
	Rust	Mancozeb
	Scab	Amobam
		Mancozeb
		Maneb
		Polyram
		Zineb
	Sooty blotch	Mancozeb
		Maneb
		Polyram
		Zineb

*Based on EPA microfiche label and registration files.

	Fruit	Disease	Registered EBDC
1			
2	Apricots	Brown rot	Maneb
3		Green rot (Jacket rot)	Maneb
4		Leaf curl	Zineb
5		Shot hole	Maneb
6			Zineb
7	Blackberry	Anthracnose	Zineb
8		Leaf rust	Zineb
9		Rust	Zineb
10		Septoria leaf spot	Zineb
11			
12	Blueberry	Botrytis blight	Mancozeb
13	Boysenberry	Anthracnose	Zineb
14		Rust	Zineb
15		Septoria leaf spot	Zineb
16			
17	Cherry (ALL)	Leaf spot	Zineb
18		Shot hole	Zineb
19	Citrus (ALL)	Greasy spot	Zineb
20			
21	Cranberries	Fruit rots	Mancozeb Zineb
22		Lophodermium	Maneb
23			
24	Currant	Leaf spots	Zineb
25	Dewberry	Cane rust	Zineb
26			
27	Gooseberry	Leaf spots	Zineb

	Fruit	Disease	Registered EBDC
1			
2	Grapes	Bitter rot	Zineb
3		Black rot	Mancozeb
4			Maneb
5			Zineb
6		Brown rot	Zineb
7		Bunch rot (Botrytis)	Mancozeb
8			Zineb
9		Dead-arm	Mancozeb
10			Zineb
11		Downy mildew	Mancozeb
12			Zineb
13	Kumquat	Ripe rot	Zineb
14		Greasy spot	Zineb
15	Lemons	Storage rots	Zineb
16			
17	Loganberry	Anthracnose	Zineb
18		Septoria leaf spot	Zineb
19			
20	Nectarine	Brown rot	Maneb
21			Zineb
22		Coryneum blight (leaf blight, shot hole)	Maneb
23			Zineb
24		Leaf curl	Zineb
25		Leaf spot	Zineb
26		Scab	Zineb
27			
	Papaya	Anthracnose	Mancozeb
			Maneb
		Black spot	Maneb
		Phytophthora fruit rot	Mancozeb

1	Fruit	Disease	Registered EBDC
2	Peach	Brown rot	Maneb
3			Zineb
4		Leaf curl	Zineb
5		Leaf spots	Zineb
6		Scab	Zineb
7			Maneb
8	Pear	Shot hole (blight)	Zineb
9		Bitter rot	Mancozeb
10		Black rot	Mancozeb
11		Fire blight	Zineb
12		Flyspeck	Mancozeb
13		Rust	Mancozeb
14		Scab	Mancozeb
15		Sooty blotch	Mancozeb
16			Zineb
17	Pineapple	Pear psylla insect	Mancozeb
18	Plum and prunes	Heart rot	Mancozeb
19		Black knot	Zineb
20		Brown rot	Zineb
21		Leaf curl	Zineb
22		Leaf spots	Zineb
23	Raspberry	Scab	Zineb
24		Anthracnose	Zineb
25	Strawberry	Septoria leaf spot	Zineb
26		Stem rot	Zineb
27			

Table 5. EBDC fungicides registered for use in turfgrass disease control.*

<u>Fungicide</u>	<u>Diseases Listed on Labels</u>
Maneb	Melting out Brown patch Stem rust Leaf rust Stripe smut Dollar spot
Zineb	Helminthosporium Rust Slime mold Cottony blight Fading out Leaf spot Melting out Pythium Slime mold Curvularia
Mancozeb	Algae Fusarium root rot Fusarium Helminthosporium Pythium Rhizoctonia Rust Sclerotinia Slime molds Brown patch Copperspot Dollar spot Fusarium blight Melting out Pink snow mold Pythium blight

*Based on EPA microfiche label and registration files.

Table 6. Diseases of Flower Crops in Which EBDC Fungicides
Have Been Received for Control*

	<u>Maneb</u>	<u>Registered</u>
Aster	Rust	Yes
Chrysanthemum	Ascochyta Blight	Yes
	Botrytis Petal Spot	Yes
Geranium	Rust	No
Rose	Black Spot	Yes
Snapdragon	Rust	Yes
	<u>Zineb</u>	<u>Registered</u>
Aster	Rust	Yes
Carnation	Alternaria Leaf Spot and Branch Rot	Yes
	Rust	No
	Greasy Blotch	No
Chrysanthemum	Ascochyta Blight	Yes
	Rust	Yes
	Botrytis Petal Spot	Yes
Celosia	Leaf Spots	No
Columbine	Rust	No
Dahlia	Botrytis Blight	Yes
Delphinium	Leaf Spot	Yes
Freesia	Botrytis Leaf Blight	No
Geranium	Botrytis Blight	Yes
	Rust	No
Gladiolus	Botrytis Leaf Blight	Yes
Hollyhock	Rust	Yes
Hydrangea	Leaf Spot	Yes
Impatiens	Leaf Spot	No
Lily	Botrytis Blight	Yes
Marigold	Leaf Spot	No
Nasturtium	Leaf Spot	No
Pansy	Anthracnose	Yes
	Leaf Spot	Yes
	Scab	No
Peony	Botrytis Blight	Yes
	Leaf Spots	No
Phlox	Leaf Spot	No
Rose	Black Spot	Yes
Snapdragon	Rust	Yes
	Anthracnose	Yes
	Downy Mildew	Yes
Stock	Leaf Spot	No
Sweet Pea	Anthracnose	No
	Leaf Spot	No

*Based on State experiment station bulletins.

Table 7. Common Woody Ornamentals Diseases in Which EBDC Fungicides Have Been Recommended for Control*

		<u>Mancozeb</u>	<u>Registered</u>
3	European horse		
4	chestnut	Leaf blotch	No
		Leaf spot	Yes
5	Camellia	Flower blight	Yes
	Hornbeam	Leaf spots	No
6	Hickory	Leaf spot	Yes
	Catalpa	Leaf spot	No
7	Hackberry	Leaf spot	No
	Redbud	Leaf spot	No
8	Fringetree	Leaf spot	No
	Virgin's bower	Leaf spot and stem rot	No
9	Dogwood	Leaf spots	Yes
	Cotoneaster	Leaf spots	No
10	Hawthorn	Leaf blight	No
		Rusts	No
11		Scab	No
	Bush honeysuckle	Leaf spot	No
12	Eleagnus	Leaf spot	No
	Euonymus	Anthraxnose	No
13	Beech	Leaf spot	No
	Forsythia	Leaf spot	No
14	Franklinia	Leaf spot	No
	Coffee tree	Leaf spot	No
15	Witch hazel	Leaf spot	No
	Winterberry	Tar spots	No
16		Leaf spots	No
	Larch	Needle rusts	No
17	Privet	Leaf spot	No
	Honeysuckle	Leaf blight	Yes
18	Magnolia	Leaf spot	No
	Magnolia	Leaf spot	No
19	Flowering crabapple	Rust	Yes
		Scab	Yes
20		Bitter rot	Yes
		Sooty blotch	Yes
21	Pachysandra		
	terminalis	Twig blight	Yes
22	Boston ivy	Leaf spot	No
	Princess tree	Leaf spot	No
23	Mock orange	Leaf spot	No
	Cherry laurel	Leaf spot	No
24	Ornamental peach	Leaf curl	Yes
	Flowering Japanese		
25	cherries	Witch's broom	No
	Oak	Leaf blister	No
26		Leaf spot	No

*Based on State experiment station bulletins.

1	Table 7 (cont'd.)		
		<u>Mancozeb (cont'd.)</u>	<u>Registered</u>
2	Azalea	Azalea petal blight	Yes
3		Azalea leaf spot	Yes
		Dieback	No
4	Rose	Leaf spots	No
5		Rhododendron petal blight	Yes
6		Black spot	Yes
		Leaf spot	Yes
7		Brown canker	No
		Brand canker	No
8		Common stem canker	No
		Crown canker	No
9		Cane blight canker	1No
		Alternaria leaf spot	No
10	Mountain ash	Downy mildew	Yes
		Leaf rusts	No
11	Lilac	Scab	No
	Viburnum	Phytophthora blight	No
		Downy mildew	No
12		<u>Maneb</u>	<u>Registered</u>
13	Maples	Leaf blister	No
	Camellia	Flower blight	Yes
14	Dogwood	Leaf spots	Yes
	Nazelnuts	Leaf curl	No
15	Pinus	Needle cast	Yes
		Brown spot	Yes
16	White pine	Fusiform rust	Yes
	Rose	Black spot	Yes
17		Leaf spot	Yes
		Rust	Yes
18		Cercospora leaf blight	Yes
19		<u>Zineb</u>	<u>Registered</u>
20	Maples	Purple eye leaf spot	No
	European horse chestnut	Leaf spot	Yes
21	<u>Amelanchier</u>		
	serviceberry	Rust	No
22	Boxwood	Rusts	No
	Hickory	Leaf spot	Yes
23	Flowering quince	Rust	Yes
		Leaf spots	Yes
24	Dogwood	Flower and leaf blight	Yes
		Leaf spots	Yes
25	Hawthorn	Leaf blight	No
		Rusts	No
26		Leaf spot	Yes
	Euonymus	Leaf spot	Yes
27	Ash	Leaf spot	No

Table 7 (cont'd.)

	<u>Zineb</u>	<u>Registered</u>
English ivy	Stem spot	Yes
	Twig blight	Yes
Butternut	Brown leaf spot	No
Japanese walnut	Yellow leaf blotch	No
Mountain laurel	Leaf spot	No
	Blight	No
Flowering crabapple	Rust	Yes
	Frogeye leaf spot	Yes
White pine	Southern cane rust	No
Oak	Anthracnose	Yes
Azalea	Azalea petal blight	Yes
	Azalea gall	Yes
	Leaf scorch	Yes
	Rust	No
	Azalea leaf spot	Yes
Flowering currant		
and gooseberries	Leaf spots	Yes
Rose	Botrytis blight	Yes
	Leaf spot	Yes
	Rust	Yes
	Downy mildew	Yes
Willow	Gray scab	No
	Leaf spot	No
Lilac	Leaf spot	Yes
Hemlock	Blister rust	No
	Needle rust	No
Periwinkle	Blight	No
Pinus	Leaf casts	No

Table 8. Estimated world uses of EBDC fungicides in 1975*

Crops	Millions of Pounds
Plantation	4.410
Bananas	8.875
Fruits and Nuts	27.344
Rice	3.518
Major Field Crops	10.713
Vegetables	35.692
Potatoes	60.463
Tomatoes	19.267
Seed Treatment	3.509
Turf and Ornamentals	0.533
Vineyards	79.996
Total All Uses	255.320

*Based on assessment team compilations and sales estimates by Rohm and Haas Chemical Company.

An analysis of hazards to aquatic organisms resulting from EBDC
usage on cranberries

According to information the assessment team has recieved from the main cranberry production areas, EBDC's are not applied to water during cranberry production. In Wisconsin and Oregon, the crops are grown and harvested as dry land agriculture. In Massachusetts and New Jersey fungicides are applied to cranberries only during bloom periods to control fruit rots. The bogs are drained before bloom and are not re-flooded until approximately 42 days after fungicide application in New Jersey and 64 days in Massachusetts. All fungicide application is on unflooded land.

AN ANALYSIS OF LEVELS OF EXPOSURE TO DIETARY RESIDUES OF
ETHYLENEBISDITHIOCARBAMATE AND ETHYLENETHIOUREA RESIDUES

The purpose of this section is to provide reasonably accurate estimates of human exposure to residues of the EBDC's and ETU by way of dietary intake. No attempt is made to assess the toxicological significance of the risk exposure levels derived since this aspect is not within the realm of the expertise of the team.

Maximum contributions of EBDC/ETU residues to the human diet can be estimated in various ways, none of which gives a highly accurate assessment of the actual situation. Nevertheless, some estimates appear to be more realistic than others due to the accuracy of the assumptions on which their calculation is based. The dietary exposure levels presented herein have been made under a variety of assumptions, some of which are routinely applied by regulatory agencies. In each instance, the calculations provided are based on the average food intake (1.5 kg/day) and relative proportions of food ingested in the total diet [Lehman (1962)] of an average 60 kg adult which are all factors presently used by the Toxicology Branch of the EPA in setting tolerances.

A. Exposure estimates based on food consumption and tolerances.

Potential consumption of EBDC residues may be calculated from consumption data for food items on which tolerances have been

1 established. In this type of calculation, two basic assumptions are
2 routinely applied: (1) All of a raw agricultural commodity for
3 which an EBDC tolerance (mancozeb, maneb, zineb, or metiram) has
4 been granted, is, in fact, treated. (2) At the time of consumption,
5 the EBDC residue on each food item is equivalent to the maximum EBDC
6 tolerance established for that commodity. Neither of these assump-
7 tions is valid in the light of current agricultural production and
8 consumer practices. Nevertheless, the present EBDC-RPAR issued by
9 the EPA is based, in part, upon estimates derived in this manner.
10

11 In the report by Beach and Weaner (1977), cited in the EPA-
12 EBDC-RPAR Position Document I, a theoretical daily intake [TDI] of
13 EBDC residues of 0.0608 mg/kg body weight is calculated. This value
14 has been recalculated as shown in Table 1, with the inclusion of two
15 commodities not considered in the original EPA calculation (saur-
16 kraut and fennel). The derived value of 0.0516 mg/kg body weight is
17 lower than the level shown in the earlier report because in that
18 calculation certain food factor data were entered repeatedly.
19 According to Lehman's (1962) data on food consumption "pumpkins and
20 squash" constitute 0.19% of the total diet, yet Beach and Weaner
21 enter pumpkin, squash, winter squash, and summer squash into their
22 calculations at 0.19% each for a total of 0.76% of the diet. Simi-
23 lar redundancies are evident in the earlier report for lettuce,
24 edible offals, nuts, kale, and berries, as shown in Table 2. This
25 error results in an overstatement by the EPA of 0.009 mg/kg body
26 weight which by itself is greater than the ADI.
27

1 B. Application of EBDC USE Data to Risk Exposure Calculations

2
3 The assumption that all of a given raw agricultural commodity
4 is treated with any or all of the EBDC's registered for use on that
5 crop was cited earlier as being invalid. While it is not unlikely
6 that 100% of a particular crop might be treated within one or two
7 production areas, instances in which the entire U.S. production of
8 that crop is treated would indeed be rare. Whether an EBDC is used
9 on a crop in a particular production area depends upon a number of
10 highly variable factors including the susceptibility to disease of
11 the varieties grown, the incidence of disease, climatic conditions,
12 and grower preference for alternative materials where these are
13 available.

14
15 In the interests of safety, it might be argued that consumers
16 in those production areas where all of the acreage of a particular
17 crop is treated with EBDC's are exposed to higher residue levels
18 than consumers purchasing the same food item in production areas
19 where none of the acreage is treated. On the contrary, the sophis-
20 tication of the present food distribution and marketing systems in
21 the United States is such that produce from several different
22 regions may be available at any one location. For example, one
23 third of New York's apple crop (12% of total U.S. production) is
24 treated with EBDC's, yet consumers in New York can purchase apples
25 from Washington State (36% of total U.S. production) at almost any
26 time during the year and none of these need to be treated with
27 EBDC's. Similarly, a store in Missouri may offer potatoes from

Idaho (24% U.S. production, 50% EBDC treated), Maine (8% U.S. production, 90% EBDC treated) and New York (4% U.S. production, 70% EBDC treated) for sale at the same time. In this last scenario, the Missouri consumer has a 22% chance $[100[(0.24 \times 0.50)_{ID} + (0.08 \times 0.90)_{ME} + (0.04 \times 0.70)_{NY}]]$ of purchasing potatoes from that store which were grown on acreage treated sometime during the season with one or more EBDC's.

Thus, the probability of EBDC treatment needs to be considered in any assessment of exposure. Table 3 presents data obtained in our survey of EBDC usage on 26 major crops. The states surveyed with respect to the use of EBDC's on a given crop in each case represented a combined minimum of 70% (average $85\% \pm 10\%$) of the total U.S. production of that crop (1976 crop production statistics, USDA/SRS/CRB data). If it is assumed, on the basis of EBDC registered uses, that the food items which might be treated with any of the EBDC's constitute a total of 43% (Table 1) of the dietary intake, then the 26 items in this survey (39.29% of the total diet) represent over 90% of that portion of the diet which might be treated. The percent of the food in the total diet which is treated with EBDC can be estimated from the sum of the products obtained by multiplying the food factor times the percent of U.S. production treated (Table 4). This value is estimated to be for all items for which the EBDC's are registered. Use factors, therefore, can be entered into risk assessment calculation as a means of accounting for that fraction of total consumption which has not been treated.

It should be emphasized that these data represent only that portion of the total U.S. production of 26 crops which is treated at some time with an EBDC fungicide during any given season. No judgment can be based on this data as to the significance of EBDC's in the production of a given crop in a particular region. These estimates may differ from use estimates based upon the amount of chemical applied due to variations in yield. For example, young non-bearing fruit orchards may be treated with EBDC's yet do not contribute to overall fruit production. In addition, some treated acreage is not harvested due to economic or environmental factors.

Table 5 shows the calculation of the theoretical daily intake of EBDC residues based on the presence of maximum tolerance residues and the use pattern data derived in Table 3 for 26 major crops. If it is assumed that the general use patterns demonstrated for the crops surveyed are representative of the EBDC usage on the commodities representing 3.71% of the total diet which were not surveyed but for which EBDC's are registered for use, then a maximum TDI of 0.0132 mg EBDC per kg of body weight could be expected.

Since all of the estimates obtained in the use pattern survey were those of extension personnel and plant pathologists familiar with current production practices in their respective states, they are probably the most accurate figures available. Nevertheless, if, in the interests of safety, we make a further assumption that each of the estimates provided was understated by 10%, then the TDI of EBDC residues (based on maximum tolerances) could be as high as 0.0145

mg/kg body weight or only 28% of that amount (.0516 mg/kg) estimated on the earlier assumption that 100% of each crop was treated. Even this estimate, however, is overstated because it is based on the use of maximum tolerance residues established arbitrarily for enforcement purposes and not as actual, or even as representative residue levels.

C. Use of Measured Residues for Risk Exposure Estimations

Since tolerance residues are established primarily for legal purposes so that heavily contaminated produce can be legally withheld from the marketplace, their use in calculating actual risk exposure hazards is of little practical value. In actual practice, when EBDC fungicides are used in accordance with the label restrictions, the harvest of "farm gate" residues encountered are much less than the legal tolerance limits. This point is illustrated in Table 6 based on maneb residue data submitted by the duPont Company in petitions for various tolerances. The residue levels shown for maneb represent, in each case, the maximum residue obtained when the material was applied according to the restrictions noted when the tolerance was subsequently granted.

Calculation of a TDI based on harvest residues was not possible at this writing because of the limited data available. Such a calculation, however, would probably be moot since "farm gate" residues, although less than tolerance limits, are still greater than those which the consumer might normally be expected to encounter. This is

1 due to the fact that most fresh and commercially processed fruits and
2 vegetables routinely undergo some treatment which physically reduces
3 surface pesticide residues.
4

5 Post-harvest procedures which are most routinely employed
6 include: trimming (e.g., removal of outer wrapper leaves of cabbage,
7 celery tops, carrot tops, and the peeling of various fruits for
8 processing), brushing (e.g., normal grading procedures to remove sur-
9 face pubescence on peaches and residues on apples and pears), washing
10 (e.g., various post-harvest dips and rinses to remove pesticide and
11 soil residues on a variety of fruits and vegetables). Many of these
12 post-harvest treatments are made prior to first shipping to the
13 wholesale market. Additional trimming and washing of fresh produce
14 also occurs in the retail market before the produce is displayed for
15 the consumer. Finally, many fresh food items undergo further trim-
16 ming, peeling, and washing procedures in their preparation by the
17 consumer before ingestion.
18

19 The studies by Phillips (1977) indicate that washing raw agri-
20 cultural produce removed from 33 to 87% of the EBDC residue and the
21 majority of the ETU residue prior to processing. Von Stryk (1976),
22 working with greenhouse tomatoes treated with recommended rates of
23 mancozeb, noted that harvest residues of 3.2-4.7 ppm were reduced to
24 as little as 0.4-0.8 by mechanical brushing. Thus, the routine
25 physical removal of EBDC and ETU residues prior to processing needs
26 to be considered as a very real factor in reducing the dietary risk
27 exposure to these compounds.

EBDC residues can also be markedly reduced by cooking which is normally employed for many processed food items or for food items purchased fresh but cooked before consumption. Unlike the physical treatments noted above, however, the reduction of EBDC residues through cooking does not necessarily reduce the toxic hazard they may present since a proportion of the EBDC is converted to ETU. Newsome (1976), for example, demonstrated a 38 - 48% (molar basis) conversion of EBDC's to ETU during the heating of homogenates of field treated tomatoes. Tomatoes fortified with 2 ppm of mancozeb and then fried resulted in a 45% (molar basis) conversion to ETU (Von Stryk, 1976). Because of these findings and similar results from other studies, the effects of cooking on EBDC/ETU residue exposure must also be accounted for in any assessment of the risks these levels may present.

The most realistic exposure levels on which to base consumer risk assessments would be those derived from data on residues detected in a total diet program including a variety of fresh and processed food items. Because of the limitations of the CS₂-evolution analytical procedure for dithiocarbamates (non-specific, low recoveries, and inability to detect ETU) used in the Food and Drug Administration's (FDA) "Total Diet Program," residue data acquired in that program from 1964 to 1970 are suspect and, therefore, cannot be considered in this analysis. Newer methods employing gas liquid chromatography (GLC) methods capable of distinguishing the EBDC's from other dithiocarbamates and from ETU (Newsome, 1972; and, notably, Uno, et al., 1977) have only recently been developed and

1 proven. As a consequence, only limited data have been published on
2 EBDC/ETU residues on food items.
3

4 Pecks, et al. (1977) described ETU levels in the Canadian food
5 supply in 1972. Only one third of the 167 samples collected (fresh
6 and processed) contained detectable levels of ETU (0.01 ppm). Most
7 of these ETU levels (92%) were at the level of 0.02 ppm or less. The
8 highest levels were found in 3 of 5 samples of canned spinach (ave.
9 0.047 ppm., range 0.040 - 0.050 ppm) and 3 of 5 samples of fresh
10 orange peel (ave. 0.083 ppm, range 0.030 - 0.150 ppm). Recovery
11 levels were 96% \pm 8.9%). Although Newsome's (1972) GLC method was
12 used, positive "peaks" were not confirmed by mass spectrometry. The
13 data are, therefore, also suspect in the light of the more recent
14 results of Uno, et al. (1977) who employed confirmatory procedures
15 which eliminate the detection of "false positives."
16

17 Using an improved version of Newsome's (1976) method, coupled
18 with mass spectrometry to confirm the residues detected, Uno et al.
19 (1977) examined EBDC and ETU levels in 59 samples of 16 agricultural
20 commodities. EBDC residues were found on one sample each of straw-
21 berry (1.21 ppm), spinach (1.00 ppm) and cucumber (0.34 ppm). ETU
22 residues of 0.076 ppm and 0.075 ppm respectively were found on the
23 strawberry and cucumber samples above. An additional strawberry
24 sample was shown to contain 0.008 ppm ETU.
25
26
27

On the basis of these data, if we make the broad assumption that the average EBDC and ETU residues on all agricultural produce for which the EBDC's are registered for use [43% of the total diet, Table 1] are 0.043 mg/kg of body weight and 0.003 mg/kg of body weight respectively, then the maximum dietary risk exposure to these materials can be shown to be equivalent or less than the current FAO/WHO ADI value of 0.005 mg/kg of body weight.

EBDC:

$$\frac{43\% \text{ (food factor)} \times 0.043 \text{ mg/kg} \times 1.5 \text{ kg (consumption)}}{60 \text{ kg}} = 0.00046 \text{ mg/kg body weight}$$

ETU:

$$\frac{43\% \text{ (food factor)} \times 0.003 \text{ mg/kg} \times 1.5 \text{ kg (consumption)}}{60 \text{ kg}} = 0.00003 \text{ mg/kg body weight}$$

Considering that only 12% of the food in the total diet is actually treated with EBDC's during production (Table 4), yet another margin of safety exists and the exposure level needs to be recalculated as shown below:

EBDC:

$$\frac{12\% \times 0.043 \text{ mg/kg} \times 1.5 \text{ kg}}{60 \text{ kg}} = 0.00129 \text{ mg/kg body weight}$$

ETU:

$$\frac{12\% \times 0.003 \text{ mg/kg} \times 1.5 \text{ kg}}{60 \text{ kg}} = 0.000009 \text{ mg/kg body weight}$$

Assuming the stoichiometric conversion of all the ingested EBDC residues (as maneb, conversion factor of 0.2852), the total ETU

1 exposure level (including that present as residue at ingestion)
2 would be only 0.000059 mg/kg. Using the no effect level of 5 mg/kg
3 (EPA-EBDC-RPAR Position Document 1) for ETU in rats, an exposure
4 of 0.000059 mg/kg results in a safety factor of 84,746, well above
5 the 250 value calculated by Beach and Weaner (1977). Based on the
6 information and calculations presented here, the amounts of EBDC
7 and ETU residues in the total diet as well as the potential
8 exposure to ETU as the result of its conversion from EBDC, the
9 assessment team concludes that exposure through ingestion is
10 minimal.

11
12 In summary, it is both necessary and appropriate to note the
13 following. The problem with exposure estimates based on the broad
14 assumptions routinely used by the EPA is that so many "margins of
15 safety" are entered, and then multiplied, that the final calcu-
16 lation is greatly inflated and has little relationship to the
17 actual risk involved. It would appear more realistic to first cal-
18 culate the probable exposure levels using experimental data where
19 this is available and, where it is not, then to apply assumptions
20 which are consistent with current agricultural practices. A value
21 derived in this manner can then be considered as a descriptive
22 value and, hence, is useful in interpreting the exposure risk. If
23 it is necessary to compute a margin of safety, this should be done
24 only on the completed calculation.

25
26
27

SUMMARY AND CONCLUSIONS

1. We find the respective EBDC and ETU exposure levels of 0.0608 and 0.02 mg/kg body weight cited in the EPA EBDC RPAR are unnecessarily high and exceed our estimates by two orders of magnitude.
2. EPA's calculations of EBDC exposure levels are based on the assumptions that all of a raw agricultural commodity for which an EBDC is registered is treated and that, at the time of consumption, each treated food item carries residues equivalent to the maximum EBDC tolerance granted for that crop. We feel these assumptions are unrealistic in that they do not reflect current agricultural and consumer practices.
3. The use of harvest residue data for exposure calculations is also unrealistic in the light of post-harvest treatments which markedly reduce (33-87%) EBDC residues on the surfaces of food crops.
4. The most realistic exposure calculations must be based on a total diet program such as the FDA conducted for dithiocarbamates prior to 1970. The data obtained in that program, however, are suspect because of the limitations of the analytical methods employed which were cited in the RPAR statement. More sophisticated and reliable analytical methods, utilizing

gas-liquid chromatography and mass spectrometry, have only recently been employed and, as a result, only limited EBDC and ETU data are available at this time.

5. We estimate EBDC and ETU residue exposure levels are 0.000129 and 0.00009 mg/kg of body weight, respectively. This level of EBDC exposure is well below the FAO/WHO recommended temporary ADI of 0.005 mg/kg of body weight. The total ETU (residue and EBDC conversion) exposure level is 0.000059 mg/kg of body weight which allows a safety factor of 84,746 based on a no-effect level of 5 mg/kg rat body weight.

Table 1 . Calculation of the theoretical daily intake of EBDC residues based on consumption data for food items on which tolerances have been established.

Food items	Food factors(%) ¹	Tolerances (mg/kg) ²				EBDC Contribution to daily intake (mg/kg) ³
		mancozeb	maneb	zineb	metiram	
Wheat flour	8.05	1 FA	-	-	-	0.0805
Potatoes	7.00	1 IT	0.1	0.5	0.5	0.0700
Citrus	4.00	-	-	7	-	0.2800
Tomatoes	3.34	4	4	4	4	0.1336
Melons	1.98	4	4	4	4	0.0792
Apples	1.81	7	7	2	2	0.1267
Bananas (pulp only)	1.51	0.5	0.5	-	-	0.0076
Sweet corn	1.19	0.5	5	5	0.5 IT	0.0595
Lettuce & escarole ⁴	1.15	-	10	10	-	0.2875
- Romaine		-	-	25	-	
Peaches	1.03	-	10	7	-	0.1030
Onions	1.01	0.5	7	7	-	0.0707
Calary	.76	5	5	5	5	0.0308
Snap beans	.74	-	7	7	-	0.0518
Cucumber	.73	4	4	4	4	0.0292
Edible offals ⁴	.69					0.0035
- Kidney		0.5	-	-	-	
- Liver		0.5	-	-	-	
Nuts ⁴	.60					0.0420
- Almonds		-	0.1	-	-	
- Peanuts		0.5	-	7	0.5 IT	
- Pecans		-	-	-	0.5	
Carrots	.55	2	7	7	-	0.0385
Dry beans	.50	-	7	7	-	0.0350
Cabbage	.49	-	10	10	-	0.0490
Green peas	.49	-	-	7	-	0.0343
Beets	.44	-	-	7	-	0.0308
Cauliflower	.43	-	10	7	-	0.0430
Sauerkraut (as cabbage)	.42	-	10	10	-	0.0420
Pears	.32	10	-	7	-	0.0320
Grapes	.32	7	7	7	-	0.0224
Egg plant	.32	-	7	7	-	0.0224
Spinach	.29	-	10	10	-	0.0290
Peppers	.25	-	7	7	-	0.0175
Asparagus	.23	0.1	-	-	-	0.0002
Plum & prunes	.23	-	-	7	-	0.0161
Pumpkin & squash ⁴	.19					0.0133
- Pumpkin		-	7	7	-	
- Squash		-	-	4	-	
- Summer squash		4	4	7	-	
- Winter squash		-	4	-	-	
Broccoli	.19	-	10	7	-	0.0190
Strawberries	.19	-	-	7	-	0.0133
Cherries	.17	-	-	7	-	0.0119
Brussel sprouts	.16	-	10	7	-	0.0160
Kale ⁴	.14	-	10	10	-	0.0350
- Swiss chard		-	-	25	-	
- Collards		-	-	25	-	
- Mustard greens		-	10	10	-	

[continued]

Table 1. Continued - 2

Food items	Food factors(%) ¹	Tolerances (mg/kg) ²				EBDC contribution to daily intake (mg/kg) ³
		mancoszeb	maneb	zinab	metiram	
Dry peas	.12	-	-	7	-	0.0084
Apricots	.12	-	10	7	-	0.0120
5 Raisins & currants	.12	28 FA	-	7	-	0.0336
Cranberries	.10	7	7	7	-	0.0070
6 Rye flour	.08	1 FA	-	-	-	0.0008
Berries, other ⁴	.06	-	-	-	-	0.0042
- Boysenberries		-	-	7	-	
- Dewberries		-	-	7	-	
- Gooseberries		-	-	7	-	
8 - Loganberries		-	-	7	-	
- Youngberries		-	-	7	-	
9 Spices ⁴	.06	-	-	-	-	0.0060
- Fennel		10	-	-	-	
- Parsley		-	-	7	-	
10 Nectarines	.06	-	10	7	-	0.0060
Figs	.05	-	7	-	-	0.0035
11 Raspberries	.04	-	-	7	-	0.0028
Blackberries	.03	-	-	7	-	0.0021
12 Rhubarb	.001	-	10	-	-	0.0001
Total	42.751					2.0628

FA = food additive IT = interim tolerance - = not applicable

¹ Quarterly Bulletin of the Association of Food & Drug Officials 26(3): 149-151 (July, 1962), currently used by the EPA.

² 21 CFR 123.460, 40 CFR 180.110, 40 CFR 180.115, 40 CFR 180.176, and 40 CFR 180.217.

³ Calculated on the basis of the maximum tolerance established for any EBDC fungicide registered for use on a particular commodity

⁴ Food item and food factor published in the Quarterly Bulletin (see footnote 1) under which are grouped similar food items not specifically listed in that publication but for which tolerances have been granted. This is done in order to avoid redundancies evident in EPA calculations where, for example, lettuce, endive (escarole), and romaine are each listed as constituting 1.15% of the total diet.

Quantity in diet: $1.5 \text{ kg}^* \times 2.0628 \text{ mg/kg} = 3.0942 \text{ mg}$

Theoretical daily intake: $3.0942 \text{ mg}/60 \text{ kg human}^* = 0.0516 \text{ mg/kg of body weight}$

* Calculations are based on the average values for the amount of food eaten per day (1.5 kg) by a 60 kg human adult, as currently used by the Toxicology Branch, EPA, in setting tolerances.

TABLE 2. Comparison of EBDC exposure levels on various food items as calculated in accordance with Lehman's (1962) food factor data as published and as shown by Beach & Weaner (1977) for the EPA. EBDC residues are represented by the maximum tolerance allowed for each crop.

EPA's application of Lehman's data				Strict use of Lehman's data		
Food item	Food factor (%)	Maximum tolerance (mg/kg)	Contrib. to daily intake (mg/kg)	Food factor (%)	Maximum tolerance (mg/kg)	Contrib. to daily intake (mg/kg)
Lettuce	1.15	10	0.1150			
Endive	1.15	10	0.1150	1.15	25	0.2875
Romaine	1.15	25	0.2875			
Kidney Liver	0.69	0.5	0.0035	0.69	0.5	0.0035
	0.69	0.5	0.0035			
Peanuts	0.60	7	0.0420			
Almonds	0.60	0.1	0.0006	0.60	7	0.0420
Pecans	0.60	0.5	0.0030			
Pumpkin	0.19	7	0.0133			
Squash	0.19	4	0.0076	0.19	7	0.0133
Summer squash	0.19	7	0.0133			
Winter squash	0.19	4	0.0076			
Kale	0.14	10	0.0140			
Mustard grns.	0.14	10	0.0140	0.14	25	0.0350
Collards	0.14	25	0.0350			
Swiss chard	0.14	25	0.0350			
Boysenberries	0.06	7	0.0042			
Dewberries	0.06	7	0.0042	0.06	7	0.0042
Gooseberries	0.06	7	0.0042			
Loganberries	0.06	7	0.0042			
Youngberries	0.06	7	0.0042			
TOTAL	8.25%		0.7309	TOTAL	2.83	0.3855

Error calculation: $0.7309 \text{ mg/kg} - 0.3855 \text{ mg/kg} = 0.3454 \text{ mg/kg}$
Quantity in diet (error value only): $0.3454 \text{ mg/kg} \times 1.5 \text{ kg (daily intake)} = 0.5181 \text{ mg}$
Theoretical daily intake (error value only): $0.5181 \text{ mg} / 60 \text{ kg adult} = 0.0086 \text{ mg/kg b-w}$

TABLE 3. Ethylenebisdithiocarbamate (EBDC) fungicide use patterns in the United States on 26 major food crops.

Commodity / Site	% in diet ¹ of item	% U.S. production ²	% site treated ³	% U.S. production treated ⁴
WHEAT				
	8.05			
Kansas		15.8	14.0	2.2
N. Dakota		13.4	25.0	3.4
Montana		7.8	10.0	0.8
Oklahoma		7.0	5.0	0.4
Washington		6.7	0.0	0.0
Minnesota		6.1	40.0	2.4
Texas		4.8	0.0	0.0
Nebraska		4.4	10.0	0.4
Illinois		3.4	5.0	0.2
Idaho		3.2	2.0	0.1
Ohio		3.1	5.0	0.3
Other		24.3	12.6*	3.1
Total U.S. wheat treated				13.2
POTATOES				
	7.00			
Idaho		24.1	50.0	12.1
Washington		15.8	20.0	3.2
Oregon		8.2	48.0	3.9
Maine		7.8	90.0	7.0
California		6.8	60.0	4.1
Wisconsin		4.3	75.0	3.2
Minnesota		3.7	24.0	0.9
New York		3.7	70.0	2.6
Other		25.6	54.6*	14.0
Total U.S. potatoes treated				51.0
CITRUS				
	4.00			
Florida		73.1	25.0	18.3
California		18.7	2.0	0.4
Texas		5.2	0.0	0.0
Arizona		3.0	0.0	0.0
Other		0.0		
Total U.S. citrus treated				18.7
TOMATOES				
	3.34			
California		71.4	11.0	7.9
Ohio		6.9	100.0	6.9
Florida		6.0	90.0	5.4
Indiana		3.1	84.0	2.6
New Jersey		2.7	56.0	1.5
Other		9.9	68.2	6.8
Total U.S. tomatoes treated				31.1
MELONS				
	1.98			
California		27.1	2.0	0.5
Florida		25.7	89.0	22.9
Texas		16.1	60.0	9.7
Georgia		6.9	66.0	4.6
Arizona		4.6	1.0	0.05
Other		19.6	43.6*	8.5
Total U.S. melons treated				46.3

TABLE 3 Continued - 2

Commodity / Site	% in diet ¹ of item	% U.S. production ²	% site treated ³	% U.S. production treated ⁴
APPLES	1.81			
Washington		35.6	0.0	0.0
New York		12.0	33.0	4.0
Michigan		8.0	75.0	6.0
Pennsylvania		5.8	90.0	5.2
N. Carolina		4.3	90.0	3.9
Virginia		2.8	90.0	2.5
Illinois		1.4	75.0	1.1
Other		30.1	64.7*	19.5
Total U.S. apples treated				42.4
BANANAS	1.51			
Hawaii		100.0	1.0	1.0
Total U.S. bananas treated				1.0
SWEET CORN	1.19			
Wisconsin		18.8	1.0	0.2
Minnesota		17.4	28.0	4.9
Oregon		10.8	0.0	0.0
Florida		10.2	97.0	9.9
Illinois		8.4	33.0	2.8
Washington		7.2	0.0	0.0
Other		27.2	26.5*	7.2
Total U.S. sweet corn treated				25.0
LETTUCE & ESCAROLE	1.15			
California		70.8	3.0	2.1
Arizona		13.6	50.0	6.8
Florida		4.2	100.0	4.2
Colorado		2.2	90.0	2.0
New Mexico		1.8	50.0	0.9
Other		7.4	58.6*	4.3
Total U.S. lettuce & escarole treated				20.3
PEACHES	1.03			
California		65.0	0.0	0.0
S. Carolina		8.5	5.0	0.4
Georgia		6.6	0.0	0.0
Pennsylvania		3.6	0.0	0.0
New Jersey		2.7	0.0	0.0
Other		13.6	1.0*	1.4
Total U.S. peaches treated				1.8
ONIONS	1.01			
California		25.2	45.0	11.3
Texas		19.0	75.0	14.3
Oregon		12.6	100.0	12.6
New York		10.3	65.0	6.7
Idaho		8.3	100.0	8.3
Colorado		6.2	50.0	3.1
Wisconsin		1.2	50.0	0.6
Other		17.2	69.3	11.9
Total U.S. onions treated				68.8

TABLE 3 Continued - 3

Commodity / Site	% in diet ¹ of item	% U.S. production ²	% site treated ³	% U.S. production treated ⁴
CABBAGE	.91			
(incl. saurkraut)				
Florida		17.3	92.0	15.9
New York		16.2	25.1	4.1
Texas		15.3	39.0	6.0
California		7.3	40.0	2.9
N. Carolina		5.3	0.0	0.0
New Jersey		3.9	20.0	0.8
Ohio		3.8	50.0	1.9
Michigan		2.7	25.0	0.7
Other		28.2	36.4	10.3
Total U.S. cabbage-treated				42.6
CELERY	.76			
California		65.7	20.0	13.1
Florida		25.1	100.0	25.1
Michigan		6.0	25.0	1.5
New York		1.8	50.0	0.9
Other		1.4	48.8*	0.7
Total U.S. celery treated				41.3
SNAP BEANS	.74			
Wisconsin		19.3	0.0	0.0
Oregon		18.4	0.0	0.0
New York		14.3	3.0	0.4
Florida		9.2	96.0	8.8
California		5.3	1.0	0.1
Tennessee		4.3	50.0	2.2
Michigan		4.0	10.0	0.4
Other		25.2	22.9	5.8
Total U.S. snap beans treated				17.7
CUCUMBERS	.73			
Michigan		14.8	7.0	1.0
California		11.4	6.0	0.7
N. Carolina		11.0	28.0	3.1
Ohio		6.8	30.0	2.0
Texas		5.7	13.2	0.8
Wisconsin		4.7	1.0	0.05
S. Carolina		4.6	100.0	4.6
Maryland		3.8	20.0	0.8
Other		26.6	32.1*	0.5
Total U.S. cucumbers treated				30.4
CARROTS	.55			
California		47.6	10.0	4.8
Texas		14.2	48.9	6.9
Washington		9.2	0.0	0.0
Michigan		8.4	25.0	2.1
Wisconsin		6.5	50.0	3.3
Other		14.1	26.3*	3.8
Total U.S. carrots treated				20.9

TABLE 3 Continued - 4

Commodity / Site	% in diet ¹ of item	% U.S. production ²	% site treated ³	% U.S. production treated ⁴
DRY BEANS	.50			
Michigan		28.4	2.0	0.6
California		16.3	1.0	0.2
Idaho		15.4	0.0	0.0
Nebraska		11.5	0.0	0.0
Colorado		9.7	0.0	0.0
Other		18.7	0.6*	0.1
Total U.S. dry beans treated				0.9
GREEN PEAS	.49			
Wisconsin		24.4	0.0	0.0
Washington		21.7	0.0	0.0
Minnesota		16.7	0.0	0.0
Oregon		9.4	0.0	0.0
Idaho		4.0	0.0	0.0
Other		23.8	0.0*	0.0
Total U.S. green peas treated				0.0
CAULIFLOWER	.49			
California		71.0	6.0	4.3
New York		10.4	6.0	0.6
Oregon		7.4	6.0	0.4
Arizona		2.3	0.0	0.0
Michigan		1.5	10.0	0.2
Other		7.4	5.6*	0.4
Total U.S. cauliflower treated				5.9
BEETS	.44			
Wisconsin		37.1	1.0	0.4
New York		35.9	0.0	0.0
Texas		6.6	27.8	1.8
Other		20.4	9.6*	2.0
Total U.S. beets treated				4.2
GRAPES	.32			
California		90.0	3.0	2.7
New York		4.3	0.0	0.0
Washington		2.8	0.0	0.0
Pennsylvania		1.4	10.0	0.1
Other		1.5	6.0	0.1
Total U.S. grapes treated				2.9
PEARS	.32			
California		43.4	5.0	2.2
Washington		28.3	0.0	0.0
Oregon		24.5	80.0	19.6
Other		3.8	28.3	1.1
Total U.S. Pears treated				22.9

TABLE 3 Continued - 5

Commodity / Site	% in diet ¹ of item	% U.S. production ²	% site treated ³	% U.S. production treated ⁴
EGG PLANT	.32			
Florida		75.2	50.0	37.6
New Jersey		24.8	60.0	14.5
Other		0.0		
Total U.S. egg plant treated				52.5
SPINACH	.29			
California		57.3	4.0	2.3
Arkansas		4.3	75.0	3.2
Oklahoma		4.3	90.0	3.9
Texas		4.1	100.0	4.1
Colorado		1.8	0.0	0.0
New Jersey		1.7	100.0	1.7
Other		26.5	61.5*	16.3
Total U.S. spinach treated				31.5
PEPPERS	.25			
Florida		35.9	70.0	25.1
California		29.8	2.0	0.6
Texas		11.7	0.0	0.0
New Jersey		8.9	75.0	6.7
Other		13.7	36.8*	5.0
Total U.S. peppers treated				37.4
CHERRIES	.17			
(sweet and tart)				
Michigan		23.0	0.0	0.0
California		21.1	1.0	0.2
Washington		22.5	0.0	0.0
Oregon		17.5	1.0	0.2
Other		15.9	0.5*	0.1
Total U.S. cherries treated				0.5

¹Lehman, A. J. 1962. Quart. Bull. Assoc. Food Drug Off. 26(3):149-151.

²Based on 1976 crop production statistics of USDA/SRS/CRB (pub). no. CrPr 2-1(77), Vg 1-2(77), Vg 2-2(77), FtNt 1-3(77), and FtNt 3-1(77).

³Percent of state's total production of a crop which is treated with any of the EBDC fungicides. Estimates obtained by personal communication with Pesticide Impact Assessment Program State Liaison Coordinators and state Extension Plant Pathologists familiar with current crop production practices in their respective areas. See * below.

⁴Calculated as % U.S. production x % site treated x 100.

*Represents states not sampled, calculated as average of estimates from all sampled states.

TABLE 4. Estimated % total U.S. production of 26 major crops which is treated with any of the EBDC fungicides and the estimated percent of the total contribution to the diet of EBDC treated food items

Food item	Percent in diet of item	Estimated % total U.S. production treated with EBDC	Estimated % contrib. of EBDC treated items to the total diet
Wheat flour	8.05	13.2	1.1
Potatoes	7.00	51.0	3.6
Citrus	4.00	18.7	0.7
Tomatoes	3.34	31.1	1.0
Melons	1.98	46.3	0.9
Apples	1.81	42.2	0.8
Bananas	1.51	1.0	0.02
Sweet corn	1.19	25.0	0.3
Lettuce & escarole	1.15	20.3	0.2
Peaches	1.03	1.8	0.02
Onions	1.01	68.8	0.7
Cabbage & saurkraut	0.91	42.6	0.3
Celery	0.76	41.3	0.3
Snap bean	0.74	17.7	0.1
Cucumber	0.73	30.4	0.2
Carrots	0.55	20.9	0.1
Dry beans	0.50	0.9	0.005
Green peas	0.49	0.0	0.0
Cauliflower	0.49	5.9	0.03
Beets	0.44	4.2	0.02
Grapes	0.32	2.9	0.01
Pears	0.32	22.9	0.01
Eggplants	0.32	52.5	0.2
Spinach	0.29	31.5	0.1
Peppers	0.25	37.4	0.1
Cherries	0.17	0.5	0.001
TOTAL	39.29%		11.01%

If it is assumed that un-surveyed crops for which the EBDC's are registered for use are treated with the same frequency as that shown in this sample, then the contribution to the total diet of EBDC treated food items can be calculated [43% of the total diet shown by Lehman (1962) is represented by crops for which EBDC's are registered].

$$[11.01\% / 39.29\%] 43\% = 12.05\% \text{ of the total diet treated with EBDC's.}$$

TABLE 5. Calculation of the theoretical daily intake of ethylenebisdithiocarbamate (EBDC) residues by a 60 kg human based on the average values for the amount of food eaten per day (1.5 kg), the established maximum tolerance residues, and estimates of the percent of each food actually treated under current agricultural practice in the United States.

Food item	Food factor(%) ¹	Max. EBDC tolerance (mg / kg)	Est. percent of U.S. production treated	EBDC contribution to daily intake (mg/kg) ²
Wheat flour	8.05	1 FA	13.2	0.0106
Potatoes	7.00	1 IT	42.7	0.0299
Citrus	4.00	7	18.7	0.0524
Tomatoes	3.34	4	25.9	0.0346
Malons	1.98	4	38.0	0.0301
Apples	1.81	7	42.2	0.0535
Bananas				
(pulp only)	1.51	0.5	1.0	0.0001
Sweet corn	1.19	5	24.0	0.0143
Lettuce & escarole	1.15	25 (romaine)	13.0	0.0374
Peaches	1.03	10	54.7	0.0563
Onions	1.01	7	66.1	0.0467
Cabbage & saurkraut	.91	10	39.0	0.0355
Celery	.76	5	42.1	0.0160
Snap beans	.74	7	15.0	0.0078
Cucumbers	.73	4	34.3	0.0100
Carrots	.55	7	20.9	0.0080
Dry beans	.50	7	0.9	0.0003
Green peas	.49	7	0.0	0.0000
Beets	.44	7	4.2	0.0013
Cauliflower	.43	10	5.9	0.0025
Grapes	.32	7	2.9	0.0006
Pears	.32	10	22.9	0.0073
Egg plant	.32	7	52.5	0.0118
Spinach	.29	10	31.5	0.0091
Peppers	.25	7	37.4	0.0065
Cherries	.17	7	0.5	0.0001
Total	39.29%			0.4827

FA = food additive IT = interim tolerance

¹ Lehman, A.J. 1962. Quart. Bull. Assoc. Food Drug Off. 26(3):149-151.

² Calculation as food factor x max. tolerance x % treated

Quantity of EBDC in diet sampled (39.29% of total diet):

$$1.5 \text{ kg} \times 0.4827 \text{ mg/kg} = 0.7241 \text{ mg}$$

Theoretical daily intake in diet sampled:

$$0.7241 \text{ mg} / 60 \text{ kg human} = 0.0121 \text{ mg/kg of body weight}$$

Extrapolation to total diet:

$$\frac{\text{T.D.I. for sample}}{\% \text{ total diet in sample}} \times \% \text{ total diet for which tolerances have been established (43\%)}$$

$$[(0.0121 \text{ mg/kg}) / 0.3929] \times 0.43 = 0.0132 \text{ mg/kg of body weight.}$$

TABLE 6. Comparison of maneb tolerance levels and measured residues at harvest on 15 foods.

Food items	Harvest interval	Maneb tol. (mg/kg)	Maximum residue (mg/kg) ¹
Potatoes	NTL	0.1	ND
Tomatoes	5 days	4	0.09
Apples	15 days	2	0.20
Sweet corn	NTL	5	0.20
Lettuce	10 days	10	2.50
Peaches	2 days	10	8.60
Snap beans	4 days	10	5.50
Cucumbers	5 days	4	0.07
Carrots	7 days	2	0.10
Dry beans (lima)	4 days	7	0.00
Cabbage	7 days	10	0.43
Peppers	NTL	7	0.50 ³
Broccoli	3 days ²	10	7.30
Squash	5 days	4	0.09
Apricot	14 days	10	0.12

NTL = no time limit

ND - none detected

¹ Residue data provided by E. I. DuPont Co. as extracted from petitions submitted by duPont for the purpose of having tolerances established. Data reported in each case is the maximum residue obtained when maneb was used under the conditions (time limitations) subsequently specified when the tolerance was granted. One exception is noted in footnote 3.

² 3 day interval allowed if broccoli is washed and trimmed.

³ Data excluded was for unwashed peppers collected 30 min. after treatment (5.2 ppm) and from washed peppers in the same test (0.09 ppm).

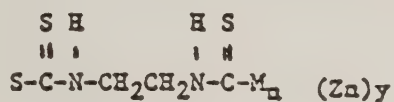
The Transformations of the Ethylenebisdithiocarbamate (EBDC)
Fungicides in Biological and Non-biological Systems

Introduction

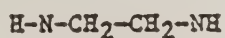
Realistic estimates of human exposure to residues of the EBDC's and ETU by way of dietary intake lead to the conclusions that there is a small but finite level of EBDC and ETU ingested by the population at large. An adequate assessment of the risk associated with dietary intake must include evaluation of data and information concerning the transformations of the EBDC fungicides in biological and non-biological systems. This section reviews and summarizes animal metabolism studies, plant metabolism studies, studies on the fate of EBDC fungicides in soil and water, and information on the metabolic fate of ETU. As was true with the dietary exposure section, the toxicological significance of metabolism and transformation of EBDC's is not assessed.

Abbreviations and Codes:

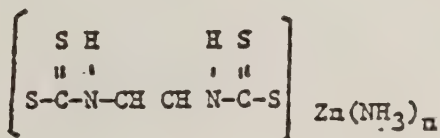
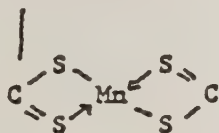
The compounds discussed and abbreviations used are shown below.



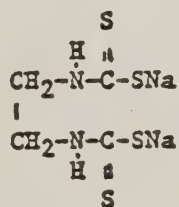
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dithane M-45



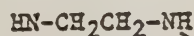
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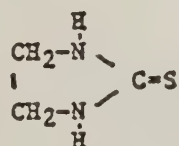
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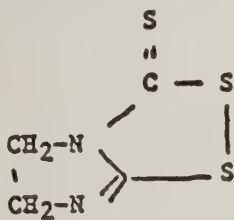
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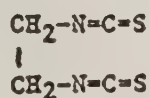
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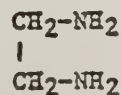
ethylenethiourea
ETU



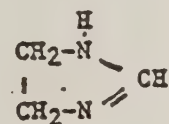
5,6-dihydro-3-H
imidazo [2,1-C]-
1,2,4-dithiazole-3-thione
DIDT, EBIS



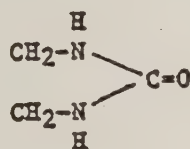
ethylenediisothiocyanate
EDIC



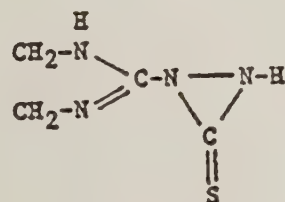
ethylenediamine
EDA



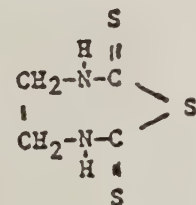
2-imidazoline
IDZ



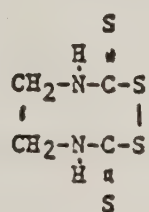
ethyleneurea
EU



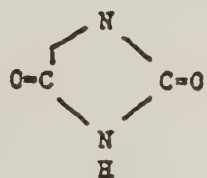
1-(2'-imidazolin
2'-yl) 2-imidazolidinethion
Jaffes Base



ethylene thiuram
monosulfide (ETM)



ethylenethiuram
disulfide
ETD



hydantoin

Animal Metabolism of EBDC Fungicides

The studies reported by Lyman (1971) are perhaps the most comprehensive investigations of EBDC metabolism in animals that have been published. Rats orally dosed with [ethylene- ^{14}C] mancozeb excreted 70.9% of the ^{14}C in the feces and 15.5% in the urine (Table 1). DIDT, EU, and ETU were present in both the urine and feces (Table 2, Figure 1). In addition the urine contained EDA and the acetyl and formyl derivatives of this compound (Table 2, Figure 1). The nature of the radiolabeled residues in the rat tissues one day after the last dose of mancozeb was not determined; however, the concentrations of ^{14}C in the thyroid was several times greater than that of all other tissues and organs analyzed. Only 0.314% of the administered U^{14}C remained in the entire animal when sacrificed one day after the last dose was given (Table 3).

A cow dosed with [ethylene- ^{14}C] mancozeb also excreted most of the ^{14}C in the feces and urine (Table 4); this was generally true when the dose given was 1, 5, or 25 ppm (Lyman, 1971). EU and ETU were detected in both the urine and milk from this cow (Figure 1, Table 5). The amount (ppm) of residue in the milk was proportional to the amount of mancozeb fed to a cow (Table 6).

Seidler et al. (1970) dosed rats with [ethylene- ^{14}C] maneb and reported that approximately 55% of the ^{14}C was excreted in the feces and urine within 3 days. The excreta contained EDA, ETM,

ETU (Figure 2), and unknown metabolites. One day after dosing, the rat tissues contained 1.2% of the ^{14}C given.

Rats exhaled CS_2 after being orally dosed with zineb and four metabolites were excreted in the urine (Truhaut et al., 1973). The two major metabolites in the urine were identified as EDIC and ETU.

Plant Metabolism of EBDC Fungicides

Although nabam is apparently no longer used extensively in agriculture practices, the metabolism of this compound has been studied extensively. Since it is similar to the other EBDC fungicides a discussion of the metabolism of nabam is justified. Vonk (1975) applied ^{14}C -labeled nabam to the roots and leaves of cucumber seedlings. After root treatment for 2 days, most ^{14}C -activity in the green parts of the plant was water soluble; however, considerable activity was also present in the roots and the insoluble fraction of the green parts of the plant (Figure 4). The water extracts contained ETU, DIDT, EU, IDZ (Figure 5) and other unidentified compounds (Figure 4). During the post-treatment period the concentration of ETU gradually decreased and the concentration of EU and IDZ gradually increased. Only 22-31% of the ^{14}C -activity in the plants was identified.

1 Most of the radioactivity present 2 weeks after leaf applica-
2 tion of ^{14}C -nabam which could be removed by washing contained
3 ETU, DIDT, and an unidentified polar compound(s). Extracts of the
4 treated leaves contained ETU, IDZ, and an unidentified polar com-
5 pound(s). Sijpesteijn et al. (1977) have proposed a series of
6 metabolic transformations to account for the metabolites of nabam
7 (Figure 6).
8

9 EDIC, ETU, DIDT, and sulfur were observed on the fruit of
10 tomato plants treated with maneb (Figure 7). Newsome (1975)
11 measured the residues of maneb, ETU, DIDT, and EDA on beans and
12 tomatoes from 0 to 14 days after treatment with maneb. The residues
13 were higher for beans than tomatoes but in both cases the residues
14 declined with time. After 14 days, beans contained the following
15 amounts (ppm) of the compounds: maneb 13; ETU 0.11; DIDT 0.25; EDA
16 0.09. The corresponding values for tomatoes were: maneb 10; ETU
17 0.07; DIDT 0.03; and EDA 0.05. Rhodes (1977) reported that ^{14}C -
18 residue(s) could not be identified. Sato and Tomizawa (1960)
19 reported that ETU and an unidentified compound(s) was present on
20 cucumber leaves after the application of [^{35}S] zineb. Engst et
21 al. reported that EDIC, ETU, DIDT, and sulfur were present on tomato
22 plants after treatment with zineb.
23

24 Lyman treated sugar beets, lettuce, and turnips with [^3H]-
25 mancozeb and observed a number of radiolabeled metabolites that
26 included EU, EDA, IDZ, DIDT, ETU, and Jaffes Base and the parent
27

1 compound mancozeb. The percentage of the total radioactivity repre-
2 sented by these compounds is shown in Table 7.

3
4 In a recent report, Pease and Holt (1977) indicated that ETU
5 residues in tomatoes, potatoes, cucumbers, summer squash, and canta-
6 loupes taken from 17 different locations throughout the United
7 States were less than 0.05 ppm even in the presence of up to 4 ppm
8 of maneb.

9
10 EBDC and Related Residues in Plant Materials

11
12 Because of the concern over human consumption of the EBDC
13 fungicides and/or their breakdown products, a number of residue
14 studies have been conducted. Some of the more comprehensive studies
15 have been reported by Newsome et al. (1976). For instance, there
16 was a gradual decline in the residues of the parent compound on
17 tomatoes during a 14-day period after treatment with mancozeb,
18 Manzate D, Polyram 80-W, or zineb 75W (Newsome, 1976) as shown in
19 Table 8. There was an initial increase and then a gradual decrease
20 in the residues of ETM and EDIC as shown in Table 9. Another repre-
21 sentative study showing the residues of mancozeb and ETU in apples
22 and apple products is summarized in Table 10.

23
24 There is evidence that the conditions required to cook and
25 process foods result in the conversion of the EBDC fungicides and/or
26 metabolites to ETU. For instance, boiling tomatoes that had been
27 sprayed with EBDC fungicides increased the ETU concentration as shown

in Table 11. A similar study showed that processing tomatoes, carrots, and spinach resulted in lower EBDC residues but higher ETU residues (Table 12).

The Fate of EBDC Fungicides in Soil and Water

Nabam decomposes in aqueous solutions to ETU, DDT polymers ethylenethiuron disulfide, EDA, EDIC sulfur, CS₂ and H₂S (Sijpesteijn et al. 1977). Vonk (1975) reported that ETU and DDT were the main degradation products when ¹⁴C-nabam was dissolved in water. Maneb and zineb reportedly degrade to the same group of compounds outlined for nabam (Sijpesteijn et al. 1977).

In soil, EDA, ETU, DDT, CS₂, and H₂S are formed from nabam (Sijpesteijn et al. 1977; Sijpesteijn and Vonk, 1970). Studies by Iley and Fiskell (1963) suggest that zineb was at least partially degraded by sunlight and soil cultures. Nash (1976) reported that when soil was treated with ¹⁴C-labeled nabam, zineb and mane, the radioactivity was readily absorbed by soybeans and translocated through the plant. Radioactive compounds in the plant included Jaffe's Base, hydantoin, EU, ETU, and N,N-dimethylene-5-imino-1,2-dithio-4-azolidine-3-thione. The metabolite profile was similar regardless whether the EBDC fungicides were sprayed onto the leaves or injected into the soil. Vonk and Sijpesteijn (1976) reported that microorganisms readily converted DDT to ETU.

Metabolic Fate of ETU

Newsome (1974) reported that 50% of the ETU administered (20 mg/kg) to rats and guinea pigs was excreted unchanged in the urine within 24 hours. Lyman (1971) dosed a cow with ^{14}C -labeled ETU and reported that EU, EDA, oxalic acid, glycine, and urea were major radioactive metabolites in the urine and milk (Table 13). EU and IDZ were identified as plant metabolites of ETU (Vonk, 1975). Nash (1976) reported the presence of 7-10 different degradation products in methanol extracts of soybeans treated with ETU; EU was the major metabolite identified.

ETU was converted to at least 9 different products (Cruickshank and Jarrow, 1973) by photo-oxidation; the major product (EU) and Jaffe's Base were identified. Other photo-oxidation products of ETU that have been reported include IDZ (Vonk, 1975) and glycine (Ross and Crosby, 1973). In the absence of ultraviolet light, ETU was quite stable (Ross and Crosby, 1973).

ETU was degraded more slowly in autoclaved soil than in non-sterile soil (Kaufman and Fletcher, 1973); CO_2 ethylene urea, hydantoine, Jaffe's Base and other unidentified products were detected.

The metabolism of ETU on biological and non-biological systems has been summarized by Kearney et al. 1977, as shown in Figure 10.

1
2 It is apparent that animal, plant and soil metabolism as well as
3 photochemical decomposition of ETU results in many of the same
4 compounds.

5
6
7 Summary and Conclusions

8
9 (1) The biological and non-biological transformations of the
10 various EBDC fungicides are similar. The information available
11 indicates that they are converted to a series of metabolites that
12 includes DIDT, ETU, IDZ, EU, EDIC, and ETM.

13
14 (2) The primary metabolism of the EBDC fungicides is similar in
15 plants, animals, soil, and water. Similar transformation also re-
16 sults from photodecomposition.

17
18 (3) ETU is a primary metabolite of EBDC fungicides in plants,
19 soils, animals, and water.

20
21 (4) ETU is metabolized (or transformed non-biologically) to a
22 number of metabolites that includes EU, IDZ, hydantoin, Jaffe's
23 Base, glycine, oxalic acid, CO₂, EDA, urea, natural products,
24 and other unknown compounds.

25
26 (5) The metabolism of ETU in plants and animals is similar.
27

1
2 (6) Residues of the EBDC fungicides and some of their meta-
3 bolites including ETU have been measured on food plants grown under
4 field conditions.

5
6 (7) EBDC residues, if present in or on food items, are at least
7 partially converted to ETU by cooking and other types of heat
8 processing.

Table 1. ^{14}C -labelled Dithane M-45 material balance in rats^(a,b)

Material	^{14}C , percentage of total dosage
Feces	70.90
Urine	15.50
Cage washings	3.98
Intestinal washings	0.18
Organ and tissue samples	0.31
Carcasses	0.96
Total recovery	91.83

(a) Six rats were orally dosed with 20 mg of ^{14}C -labelled Dithane M-45 each day for seven days. The rats were killed one day after the last dose.

(b) W.R. Lyman in Pesticide Terminal Residues (A.S. Tahori, ed) Butterworths, London pp 243-256 (1971)

Table 2. Percentage of ^{14}C activity in rat excreta present as known transformation products of Dithane M-45^(a)

Material	Percentage of urine ^{14}C	Percentage of Feces ^{14}C	Percentage of recovered ^{14}C
Dithane M-45	-	47.0	36.8
EBIS	5.6	7.5	7.1
ETU	28.0	6.0	10.8
EU	12.0	2.0	4.1
N-Acetyl EDA	19.0	-	4.1
N-Formyl EDA	1.0	-	0.1
EDA	3.5	-	0.7
	<hr/> 69.1	<hr/> 62.5	<hr/> 63.7

(a) Rats were orally dosed with 20 mg of ^{14}C -labeled Dithane M-45. Compounds were identified by reverse isotope dilution.

(b) W.R. Lyman in Pesticide Terminal Residues (A.S. Tahori, ed) Butterworths, London pp 243-256 (1971)

TABLE 3. Analysis of rat tissues by radioassay(a,b)

Tissue sample	Percentage of total dose given	Total wt (g)	Amount as Dithane M-45, p.p.m
Muscle	0.014	17.3	6.8
Fat	0.010	10.7	7.4
Liver	0.193	65.6	24.8
Kidney	0.076	12.6	51.6
Thyroid	0.003	0.032	865.0
Heart	0.005	5.45	8.2
Brain	0.003	9.67	2.2
Spleen	0.007	5.29	10.7
Total	0.314		

(a) Rats were orally dosed with 20 mg of ^{14}C -labeled Dithane M-45 each day for seven days. The rats were killed one day after the last dose. This corresponded to 1000 ppm in the diet.

(b) W. R. Lyman in Pesticide Terminal Residues (A. S. Thori, ed) Butterworths, London pp 243-256 (1971).

TABLE 4. ^{14}C -labelled Dithane M-45 material balance in cows(a,b)

Dose (p.p.m.)	Residue in excreta (p.p.m., as Dithane M-45)		Recovery (per cent)
1	Urine	0.50	13.9
	Feces	0.47	86.1
	Total		100.0
5	Urine	4.75	31.6
	Feces	1.49	54.4
	Total		86.0
25	Urine	19.7	32.8
	Feces	10.4	68.2
	Total		101.0

(a) A cow was dosed twice daily for three successive 14 day periods at 1 ppm, 5 ppm, and 25 ppm in the diet.

(b) W. R. Lyman in Pesticide Terminal Residues (A. S. Tahori, ed) Butterworths, London pp 243-256.

TABLE 5. ^{14}C -activity in the milk and urine of cows fed 25 ppm ^{14}C -Dithane M-45(a,b,)

Substance	Milk		Urine	
	P.p.m	Percentage of ^{14}C p.p.m	Percentage of ^{14}C	
Ethylene thiourea	0.03	23	0.06	0.84
Ethylene urea	0.01	10	0.79	12
Urea	-	-	-	3
Oxalic acid	-	-	-	3
Glycine	-	-	-	12
Fat	-	5	-	-
Protein	-	7	-	-
Lactose	-	15	-	-

(a) Dithane M-45 = Mancozeb

(b) W. R. Lyman in Pesticide Terminal Residues (A. S. Tahori, ed)
Butterworths, London pp 243-256 (1971)

TABLE 6. ^{14}C in milk versus dose level(a,b,)

Dose (p.p.m.)	Residue in milk (p.p.m.)	Ratio $\frac{\text{p.p.m. (milk)}}{\text{p.p.m. (dose)}}$
1.0	0.014	0.014
5.0	0.066	0.013
25.0	0.390	0.016

(All values are calculated as Dithane M-45)

(a) A cow was dosed twice daily for three successive 14-day periods at 1 ppm, 5ppm, and 25 ppm in the diet

(b) W. R. Lyman, Pesticide Terminal Residues (A. S. Tahori, ed) Butterworths, London pp 243-256

Table 7. Compounds detected in Plant residues two weeks after application of labeled Cithane M-45(a,b)

Compound	Percentage of ^3H activity
Ethylene urea	17
Ethylenediamine	11
Dithane M-45	9
2-Imadazoline	
N-Formyl ethylene diamine	8
Ethylene bisisothiocyanate sulphide	7
Ethylene thiourea	6
Jaffe's Base	4
Total	62 (of = 200 ppm as Dithane M-45)

(a) Dithane M-45 = Mancozeb

(b) W. R. Lyman in Pesticide Terminal Residues (A. S. Tahori, ed)
Butterworths, London pp 243-256 (1971)

Table 8. Residues^a of ethylenebisdithiocarbamate on tomatoes at various intervals after application by spraying^b

Elapsed Time (days)	Mancozeb	Manzate D	Polyram 80-W	Zineb 75W
0	8.96 \pm 0.50	13.0 \pm 1.89	3.22 \pm 0.13	4.78 \pm 0.13
1	10.9 \pm 0.56	9.40 \pm 0.92	3.45 \pm 0.28	3.68 \pm 0.26
2	9.23 \pm 0.60	8.31 \pm 0.87	3.58 \pm 0.32	4.00 \pm 0.17
3	9.15 \pm 0.40	6.26 \pm 0.58	2.54 \pm 0.10	5.24 \pm 0.12
6	4.08 \pm 0.32	3.08 \pm 0.28	1.43 \pm 0.11	1.50 \pm 0.06
10	3.92 \pm 0.13	3.82 \pm 0.17	1.30 \pm 0.09	1.83 \pm 0.15
14	3.29 \pm 0.17	3.20 \pm 0.13	0.778 \pm 0.04	1.27 \pm 0.06
Control	0.141 \pm 0.014			

^aValues (in ppm) are the means \pm S. E. of 6 samples and are expressed as zineb.

^bNewsome (1976) as reported by Kearney et al. Pure and Applied Chem 49: 675-689 (1977).

Table 9. Residues^a of ethylenethiuram monosulfide and ethylenebis (isothiocyanate) on tomatoes treated with ethylenebisdithiocarbamates in the field^b

Elapsed Time (days)	Mancizeb	Manzate D	Polyram 80-W	Zineb 75W
Ethylenethiuram Monosulfide Found (ppm)				
0	0.019 \pm 0.009	0.066 \pm 0.018	0.008 \pm 0.002	0.009 \pm 0.002
1	0.032 \pm 0.003	0.041 \pm 0.005	0.020 \pm 0.004	0.008 \pm 0.001
2	0.035 \pm 0.001	0.025 \pm 0.001	0.012 \pm 0.002	0.014 \pm 0.004
3	0.017 \pm 0.001	0.027 \pm 0.001	0.007 \pm 0.002	0.003 \pm 0.001
6	0.019 \pm 0.001	0.020 \pm 0.001	na	na
Control	0.004 \pm 0.002			
Ethylenebis(isothiocyanate) Found (ppm)				
0	0.009 \pm 0.002	0.011 \pm 0.001	0.007 \pm 0.0	0.002 \pm 0
1	0.016 \pm 0.002	0.16 \pm 0.003	0.006 \pm 0.001	0.003 \pm 0.001
2	0.013 \pm 0.001	0.015 \pm 0.001	0.002 \pm 0.001	0
3	0.014 \pm 0.002	0.013 \pm 0.001	0.005 \pm 0.001	0
6	0.003 \pm 0.001	0.016 \pm 0.001	na	na
Control	0.002 \pm 0			

^aValues are the means \pm S.E. of 6 samples

^bNewsome (1976) as reported by Kearney et al. Pure and Applied Chem 49: 675-689 (1977)

Table 10. Residues (ppm) of EBDC's/ETU on apples and apple products^a

Apples	Mancozeb	ETU	Metiran (80 W)	ETU
Before last application	4.2	0.05	0.90	0.03
After last application	12.8	0.05	12.50	0.17
2 days after	11.6	0.06	13.20	0.14
7 days after	11.1	0.05	7.00	0.07
14 days after	6.6	0.06	3.30	0.07
28 days after	3.1	0.03	1.20	0.03
42 days after	1.7	0.01	0.50	0.01
Apple juice	ND	0.05	ND	0.05
Apple pomace	14.90	0.17	3.30	0.15
Apple sauce	0.09	0.05	0.09	0.04

Four precover sprays of 2 lb/100 gls followed by 5 cover sprays of 1.5 lb/100 gallons. Apples ground and pressed at 3000 psi, racked, filtered, and heated to 93°C for 2 min. and canned.

Residue from juice extraction dried at 150°C for 15 hours.

Apples peeled, into 2% saline solution, diced, drained. Heated to slow boil (100°C) and held for 5 min. Canned and heated in boiling water for 15 min.

^a F. A. Wood (1976) as reported by Kearney et al. Pure and Applied Chem. 49: 675-689 (1977).

Table 11. Effect of cooking on ethylenethiourea residues in tomatoes
sprayed with ethylenebisdithiocarbamates^a

Time After Spraying (days)	Mancozeb M-45	Manzate D	Polyram 80-W	Zineb 75W
Uncooked				
0	0.036 ± 0.004	0.033 ± 0.004	0.025 ± 0.005	0.033 ± 0.005
1	0.065 ± 0.015	0.018 ± 0.002	0.085 ± 0.015	0.024 ± 0.003
3	0.036 ± 0.009	0.026 ± 0.003	0.006 ± 0.003	0.007 ± 0.001
6	0.017 ± 0.004	0.015 ± 0.001	0.039 ± 0.004	0.006 ± 0.003
14	0.011 ± 0.001	0.008 ± 0.001	0.009 ± 0.002	0.011 ± 0.006
Control	0.001 ± 0.001			
Boiled 10 min.				
0	1.14 ± 0.080	1.11 ± 0.138	0.217 ± 0.026	0.772 ± 0.144
1	1.33 ± 0.134	1.42 ± 0.162	0.754 ± 0.162	0.950 ± 0.117
3	1.08 ± 0.140	0.945 ± 0.173	0.584 ± 0.052	0.535 ± 0.080
6	1.03 ± 0.127	0.462 ± 0.051	0.174 ± 0.016	0.206 ± 0.005
14	0.935 ± 0.142	0.519 ± 0.049	0.184 ± 0.015	0.110 ± 0.007
Control	0.020 ± 0.002			

^aNewsome (1976) as reported by Kearney *et al.* Pure and Applied Chem. 49:
675-689 (1977)

Table 12. Summary of EBDC - ETU residues (ppm) before and after processing ^a

	<u>Eastern USA</u>		<u>Western USA</u>	
<u>Tomato</u>	EBDC	ETU	EBDC	ETU
Unwashed	0.3	—	2.1	0.01
Washed	0.2	—	0.6	0.01
Canned	—	0.03	0.5	0.11
<u>Carrots</u>				
Unwashed	0.6	—	0.1	0.01
Washed	0.3	—	0.1	0.01
Diced	0.1	—	0.1	—
Frozen	—	—	—	—
Canned	—	0.03	0.1	—
<u>Spinach</u>				
Unwashed	2.4	—	61.9	0.34
Washed	1.5	—	9.7	0.02
Frozen	0.1	0.04	0.6	0.50
Canned	—	0.18	0.1	0.71

Mancozeb was applied at the rate of 0.7 ai/0.5 ha in all cases. Spray schedules were as follows: spinach, 1 treatment with 10 day pre-harvest interval; carrot-eastern, 6 treatments at 7-10 day intervals, pre-harvest interval 7 days. Tomato-eastern, 4 treatments at 7-10 day intervals, pre-harvest interval 16 days. Tomato-western, 3 treatments at seven day intervals, pre-harvest interval 5 days.

(a) W. Phillips Interim report from Technological Resources Inc. to the U.S. Environmental Protection Agency as reported by Kearney et al. Pure and Applied Chem. 49:675-689 (1977)

Table 13: ^{14}C activity in the milk and urine of cows fed with 1 p.p.m. of $[^{14}\text{C}]$ ethylene thiourea^(a)

Material	Conc. (p.p.m.)	Milk % of total ^{14}C	Conc. (p.p.m.)	Urine % of total ^{14}C
Ethylene thiourea	0.011	31	0.12	7
Ethylene urea	0.0025	8	0.27	18
Ethylenediamine	-	-	0.14	14
Glycine	-	-	-	6
Oxalic acid	-	-	-	12
Urea	-	-	-	11
Fat	-	3	-	-
Protein	-	18	-	-
Lactose	-	16	-	-
Totals (per cent)		76		68

(a) W.R. Lyman in Pesticide Terminal Residues (A.S. Tahori, ed) Butterworths London pp 243-256 (1971)

Figure 1. Animal Metabolites of Mancozeb (a)

Proposed structure	Source	Evidence for structure	Reference
$ \begin{array}{c} \text{S} \\ \\ \text{C} - \text{S} \\ \\ \text{CH}_2 - \text{N} - \text{C} - \text{S} \\ \quad \\ \text{CH}_2 \quad \text{CH}_2 \end{array} $	Rat urine and feces	Reverse isotope dilution	a
$ \begin{array}{c} \text{H} \quad \text{H} \\ \quad \\ \text{CH}_2 - \text{N} - \text{C} = \text{S} \\ \quad \\ \text{CH}_2 \quad \text{CH}_2 \end{array} $	Rat urine and feces; Cow urine and milk	Reverse isotope dilution	a
$ \begin{array}{c} \text{H} \quad \text{H} \\ \quad \\ \text{CH}_2 - \text{N} - \text{C} = \text{O} \\ \quad \\ \text{CH}_2 \quad \text{CH}_2 \end{array} $	Rat urine and feces; Cow urine and milk	Reverse isotope dilution	a
$ \begin{array}{c} \text{H}_2\text{N} - \text{CH}_2 - \text{CH}_2 - \text{NH}_2 \\ \\ \text{CH}_2 - \text{N} - \text{C} - \text{S} \\ \quad \\ \text{CH}_2 \quad \text{CH}_2 \end{array} $	Rat urine	Reverse isotope dilution	a
$ \begin{array}{c} \text{H} \quad \text{O} \\ \quad \\ \text{H}_2\text{N} - \text{CH}_2 - \text{CH}_2 - \text{N} - \text{C} - \text{CH}_3 \\ \quad \\ \text{CH}_2 \quad \text{CH}_2 \end{array} $	Rat urine	Reverse isotope dilution	a
$ \begin{array}{c} \text{H} \quad \text{O} \\ \quad \\ \text{H}_2\text{N} - \text{CH}_2 - \text{CH}_2 - \text{N} - \text{C} - \text{H} \\ \quad \\ \text{CH}_2 \quad \text{CH}_2 \end{array} $	Rat urine	Reverse isotope dilution	a

(a) W. R. Lyman, International Symposium on Pesticide Terminal Residues Tel-Aviv.

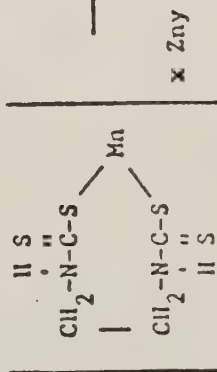


Figure 2. ANIMAL METABOLITES OF MANEB

Proposed structure	Source	Evidence for structure	Reference
$\text{H}_2\text{N}-\text{CH}_2\text{CH}_2-\text{NH}_2$	Rat urine and feces	Comparative chromatography	a
	Rat urine and feces	Comparative chromatography	a
	Rat urine and feces	Comparative chromatography	a

(a) H. Seidler et al. Nahrung 14:363 (1970)

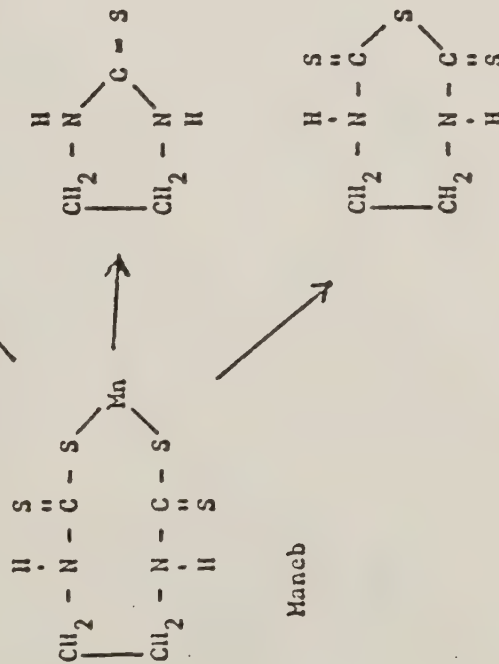
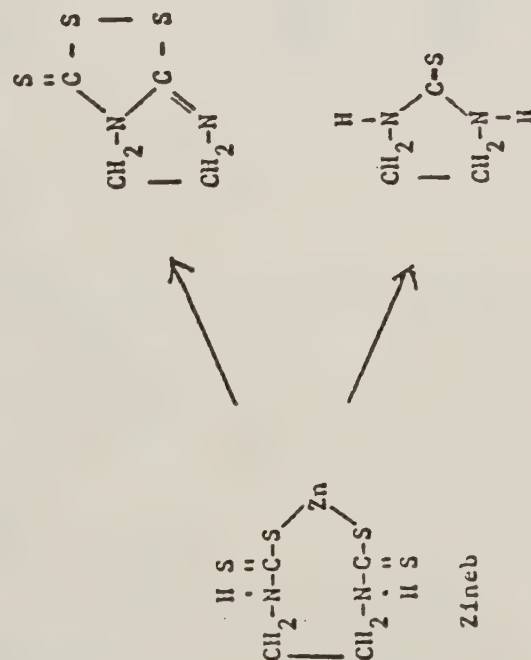


FIGURE 3 METABOLITES OF ZINEB IN ANIMALS



(a) Truhaut et al. C.R. Hebd Seanc Acad Sci Paris (D) 276, 229 (1973)

Reference

Evidence for structure

Source

8

comparative
spectrometry

Rat urine

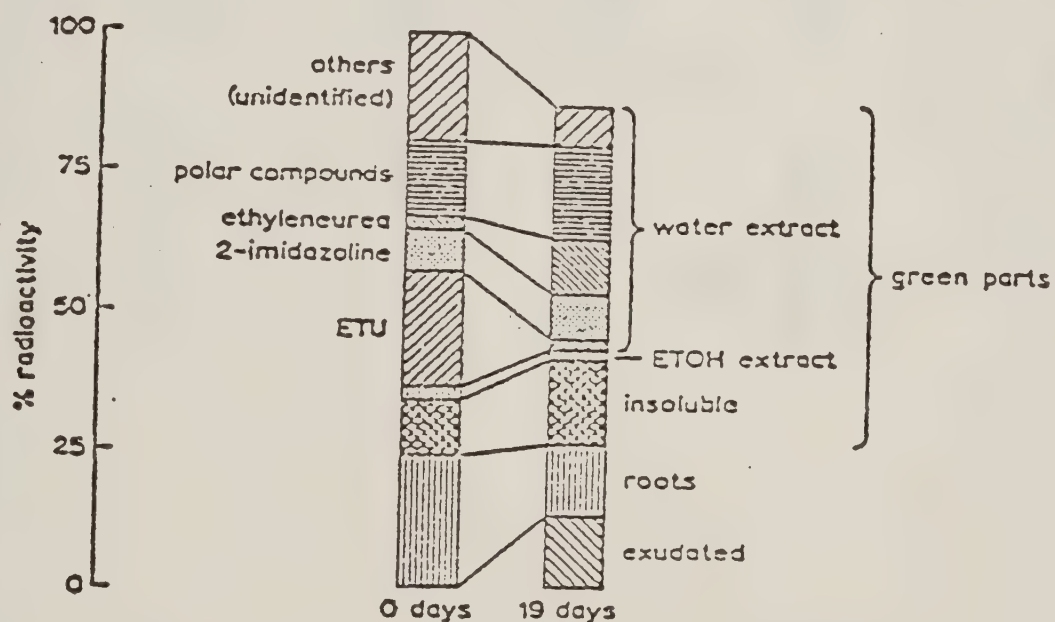
2

comparative
spectrometry

Rat urine

FIGURE 4.

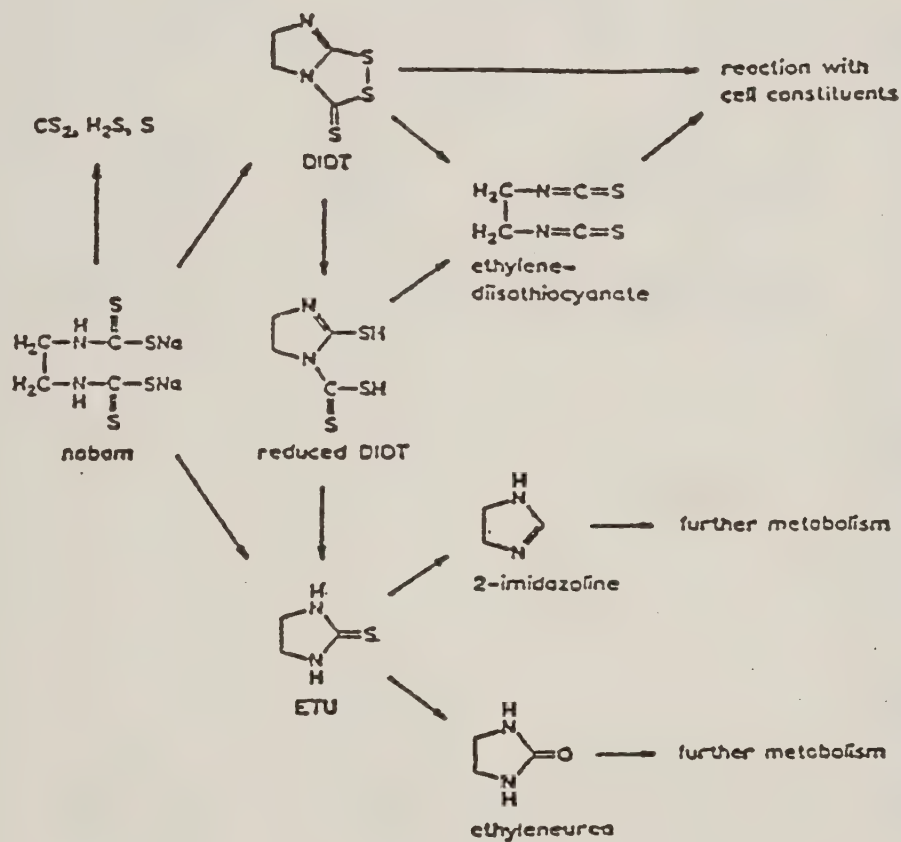
The Distribution of Radioactivity among the Different Parts,
Fractions and Compounds in Cucumber Seedlings 0 and 19 days after
Root Treatment with [^{14}C] Nabam^(a)



(a) A. Kaars Sizpesteizn, H. M. Dekhuizzen and J. W. Vonk

Antifungal Compounds Volume 2 M. R. Siegel and H. D. Sisler,
Editors, Marcel Dekker, 1977.

Figure 6. Transformations involved in metabolism of nabam by plants and microorganisms (a)



(a) Reference 5 A. Kaars Sizpesteizn, H.M. DeKuijzen and J.W. Vonk
Antifungal Compounds M.R. Siegel and H.D. Sisler, Editors; Marcel
 Dekker Inc. NY 1977.

Figure 7. Metabolites of Maneb in Plants

Proposed Structure	Source	Reference
$ \begin{array}{c} \text{H} \quad \text{H} \\ \quad \\ \text{CH}_2 - \text{N} - \text{C} - \text{S} \\ \quad \\ \text{CH}_2 - \text{N} - \text{H} \end{array} $	lettuce	a
$ \begin{array}{c} \text{S} \quad \text{H} \quad \text{S} \\ \quad \quad \\ \text{C} - \text{S} \quad \text{C} - \text{S} \\ \quad \\ \text{CH}_2 - \text{N} - \text{H} \quad \text{CH}_2 - \text{N} - \text{H} \end{array} $	kale	a
$ \begin{array}{c} \text{S} \quad \text{H} \quad \text{S} \\ \quad \quad \\ \text{C} - \text{S} \quad \text{C} - \text{S} \\ \quad \\ \text{CH}_2 - \text{N} - \text{H} \quad \text{CH}_2 - \text{N} - \text{H} \end{array} $	tomato plants	c
$ \begin{array}{c} \text{S} \quad \text{H} \quad \text{S} \\ \quad \quad \\ \text{C} - \text{S} \quad \text{C} - \text{S} \\ \quad \\ \text{CH}_2 - \text{N} - \text{H} \quad \text{CH}_2 - \text{N} - \text{H} \end{array} $	beans	d
$ \begin{array}{c} \text{S} \quad \text{H} \quad \text{S} \\ \quad \quad \\ \text{C} - \text{S} \quad \text{C} - \text{S} \\ \quad \\ \text{CH}_2 - \text{N} - \text{H} \quad \text{CH}_2 - \text{N} - \text{H} \end{array} $	tomato plants	b
$ \begin{array}{c} \text{S} \quad \text{H} \quad \text{S} \\ \quad \quad \\ \text{C} - \text{S} \quad \text{C} - \text{S} \\ \quad \\ \text{CH}_2 - \text{N} - \text{H} \quad \text{CH}_2 - \text{N} - \text{H} \end{array} $	tomato plants	c
$ \begin{array}{c} \text{S} \quad \text{H} \quad \text{S} \\ \quad \quad \\ \text{C} - \text{S} \quad \text{C} - \text{S} \\ \quad \\ \text{CH}_2 - \text{N} - \text{H} \quad \text{CH}_2 - \text{N} - \text{H} \end{array} $	tomato plants	c
$ \begin{array}{c} \text{S} \quad \text{H} \quad \text{S} \\ \quad \quad \\ \text{C} - \text{S} \quad \text{C} - \text{S} \\ \quad \\ \text{CH}_2 - \text{N} - \text{H} \quad \text{CH}_2 - \text{N} - \text{H} \end{array} $	beans	d

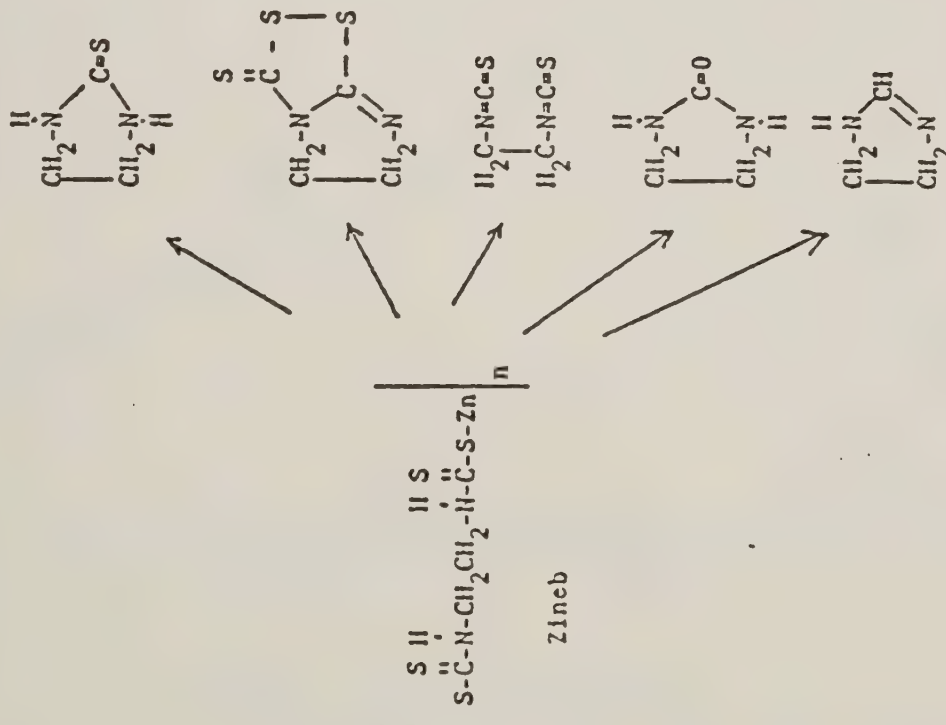
- (a) J.W. Vonk, Modeldel Rizksfoc. Landbouwetenschap Gent 41: 1883 (1976).
 (b) R. Engst, W. Schnaak and H. Rattbo, Nachrbl. Deut. Pflanzenschutzdienst (Berlin) 22:26 (1968)
 (c) W.H. Newsome, J. Agr. Food Chem. 24:999 (1976)
 (d) W.H. Newsome, J.B. Shields and B.C. Villeneuve, J. Agr. Food Chem. 23:756 (1975)

Figure 8. Plant and Microorganism Metabolites of Zineb

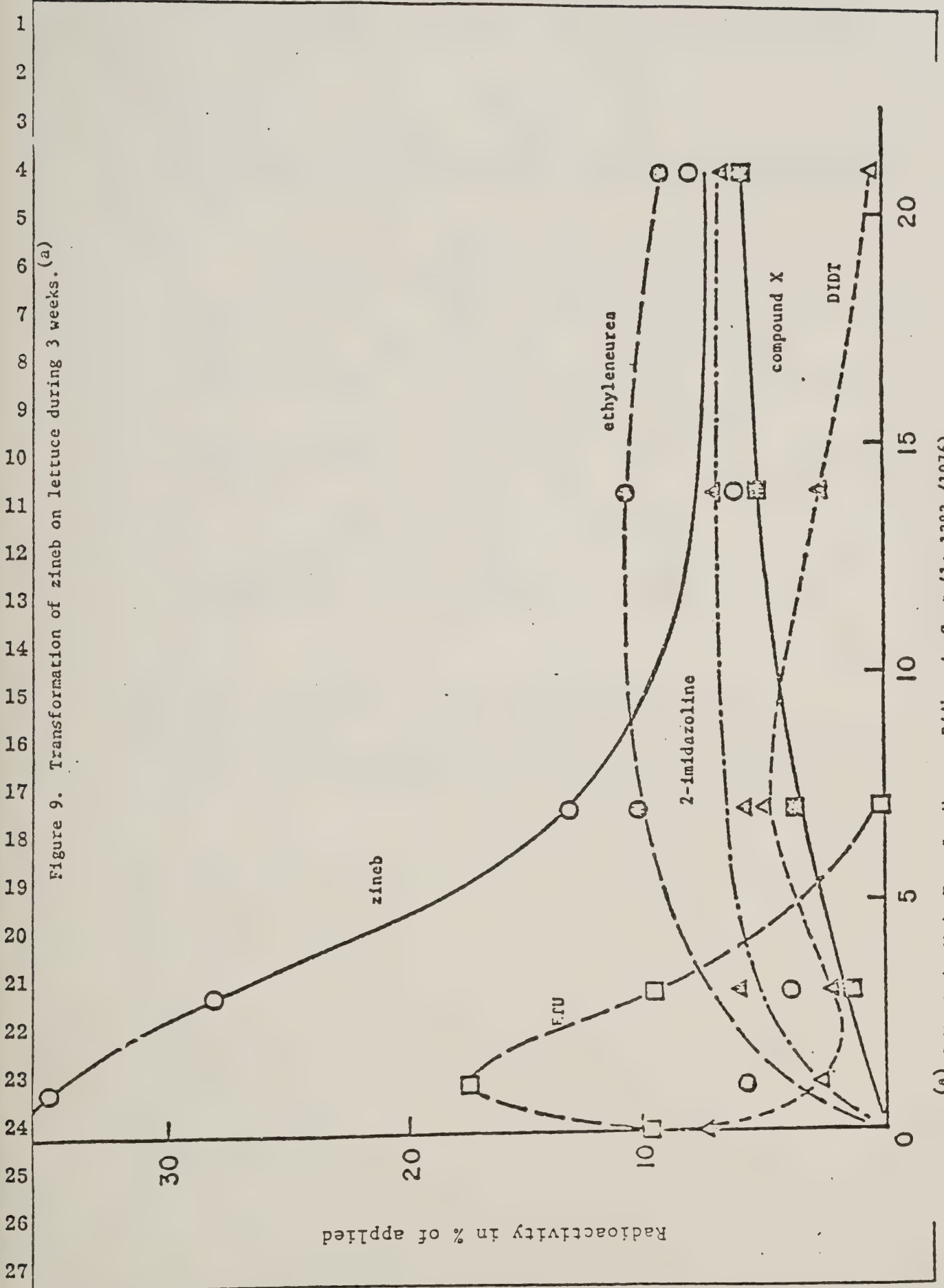
Reference

Source

Proposed Structure



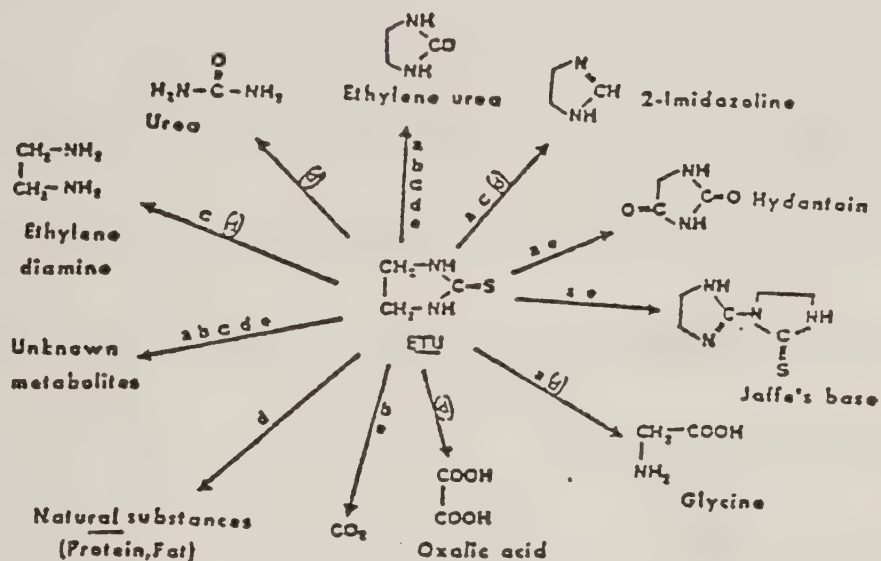
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Figure 10.

Reaction Products of ETU in Biological and Non-Biological Systems (a,b)



(a) Kearney et al. Pure and Applied Chem 49:675-689 (1977)

(b) a=photodecomposition, b=chemical oxidation, c=plants, d=animals, and e=soil. Letters in parenthesis () indicate proposed pathways.

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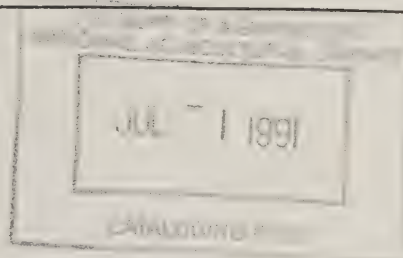
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Assessment of Ethylenebisdithiocarbamate (EBDC)
Fungicide Uses In Agriculture

USDA/State/EPA Assessment Team

Part II. An Analysis of Current EBDC Uses; Their
Benefit, the Role of Alternatives, and Impacts to Agriculture from
Changes in EBDC Use Patterns

Coordinated by the Office of
Environmental Quality Activities
USDA

September, 1978

18 SEP 1978

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OVERALL SUMMARY AND CONCLUSIONS

Since their introduction in the mid-1940's, ethytlenebisdithiocarbamate (EBDC) fungicides have become the most widely used disease prevention chemicals in the production of food in the United States and in the World. Major agricultural uses in the United States are in the production of potatoes, tomatoes, other vegetables, apples, and certain cereal grains. When totaled the six EBDC products have registrations for 1,296 site-pest combinations. Many small volume uses exist for which there are no suitable alternatives. These uses occur for "speciality" or "minor" crops as well as major crops. EBDC are essential because the fungicides have broad spectrums of activities, do not promote pathogen resistance, are relatively non-phytotoxic, and are inexpensive relative to alternatives.

Vegetables

Fungicidal sprays are used to control four major foliar pathogens of tomatoes which are Alternaria solani (Ellis & G. Martin) Jones & Grout, Cladosporium fulvum Cooke, Stemphylium solani Weber, Phytophthora infestans (Mont) deBary. In 1976, eleven states planted 109,800 acres of which 72,035 were treated with EBDC fungicides. The number of applications to fresh market tomatoes ranged from 4 to 22 at a rate of 1.2 - 2.4 lb. active ingredient (a.i.) per acre per application.

1
2 The EBDC fungicides (maneb and mancozeb) have been effective in
3 the control of major diseases of processing tomatoes for many years.
4 They are the most widely used fungicides on tomato acreage for
5 processing in the Eastern United States.
6

7 The loss of registration of these fungicides or severe re-
8 strictions on their use for tomato disease control would increase
9 the cost of production because of the higher cost of the alternative
10 fungicide. This increased cost would make it extremely difficult
11 for the tomato processing industry in the East to remain competi-
12 tively viable.
13

14 The most serious diseases of sweet corn which are controlled
15 with EBDC in the United States are northern leaf-blight caused by
16 Helminthosporium turcicum Passerini, southern leaf-blight caused by
17 Helminthosporium maydis Nisik and Miyake, and corn rust caused by
18 Puccinia sorghi Schweinitz. EBDC fungicides are the key chemicals
19 used on 97.6% of grower sweet corn disease control programs. Sweet
20 corn yields averaged 49.0 cwt per acre during the 10 years prior to
21 widespread use of EBDC fungicides. The first 10 years of EBDC
22 fungicide use, yields increased some 71.6 cwt per acre.
23

24 Bean anthracnose (Colletotrichum lindemuthianum Saccardo and
25 Magnus) Scribner and bean rust (Uromyces phaseoli typica Arthur) are
26 serious diseases of snap beans which are controlled with EBDC
27 fungicides. In 1976, 339,000 acres of snap beans were planted in

1 the United States (U.S.). EBDC fungicides are a major part of all
2 grower disease control programs on snap beans. During the 10 years
3 prior to widespread use of EBDC fungicide on snap beans, an average
4 yield was 29.0 cwt per acre. The following 10 years with EBDC
5 fungicide use the yield rose 10.7% to 32.1 cwt per acre.
6

7
8 Early-blight (Cercospora apii - Fresenius) and late-blight
9 (Septoria apii Chester and Septoria apii - graveolentis Dorogin) are
10 the most serious diseases of celery which are controlled with EBDC
11 fungicides. In 1976, 34,910 acres of celery were planted in the
12 U. S. In Florida 10,900 acres were planted and all were treated
13 with EBDC fungicides. EBDC fungicides are used by 97% of all celery
14 growers in their disease control programs. During the 10 years
15 prior to widespread use of EBDC on celery, yields averaged 295.4 cwt
16 per acre. They have risen to 388.4 cwt per acre during the
17 following 10 years.
18

19 Phytophthora blight (Phytophthora capsici Leonian), frog-eye
20 spot (Cercospora capsici Heald and Wolf), and anthracnose (Gloeosporium
21 piperatum Eli. and Ev.) are diseases on peppers having
22 varying degrees of importance throughout the U. S. All three
23 disorders are generally controlled with EBDC fungicides.
24

25 In 1976, 57,400 acres of peppers for fresh market and proces-
26 sing were planted in the U. S. Maneb, maneb plus zinc and zineb are
27 used extensively for the control of Phytophthora blight, frog-eye

1
2 spot, and anthracnose. Copper fungicides are the only alternatives,
3 and these are only recommended for frog-eye spot. The EBDC
4 fungicides are a major part of all pepper grower disease control
5 programs. Prior to the acceptance and widespread use of EBDC
6 fungicides the 10-year average yield of pepper was 65.8 cwt per
7 acre. In the past 10 years, the yield has increased 18.8% to 78.2
8 cwt per acre.

9
10 Alternaria leaf spot and blight (Alternaria brassicae
11 (Berkeley) Saccardo) and downy mildew (Peronospora parasitica
12 (Persoon) Fries) are probably the most persistent and damaging of
13 the cabbage diseases which are controlled by EBDC.

14
15 In 1976, 106,420 acres of cabbage for fresh market and
16 processing were planted in the U. S. Maneb, maneb plus zinc and
17 zineb are used extensively for the control of Alternaria leaf spot
18 and downy mildew in the U. S. EBDC fungicides are a major part of
19 all grower disease control programs on this crop. The 10 years
20 prior to widespread acceptance and use of EBDC fungicides, cabbage
21 yields averaged 156.6 cwt per acre. The next 10 years in which EBDC
22 was used, yield rose 20.1% to 188.1 cwt per acre.

23
24 Downy mildew is a serious disease of lettuce. The EBDC fungi-
25 cides, zineb and maneb, are used extensively for controlling this
26 disease. Loss of these fungicides would result in crop losses of 15
27 25% as well as a quality (or grade) reduction of 40%.

1 Downy mildew and white rust are diseases of spinach which are
2 controlled by EBDC fungicides. There are no effective registered
3 alternatives.

4
5 Cucurbits are susceptible to a number of diseases that are
6 effectively controlled by EBDC fungicides. Although alternatives
7 are available, their increased cost would undoubtedly influence
8 growers to reduce acreages.

9
10 Serious economic losses can occur in onion fields where protec-
11 tive fungicides have not been applied prior to conditions favorable
12 for disease development. EBDC fungicides are used effectively for
13 control of downy mildew, purple blotch and Botrytis leaf blight.
14 Alternate fungicides vary with the disease and the area of the
15 country.

16
17 The EBDC fungicide maneb has been recommended and used for the
18 control of downy mildew of lima beans in the mid-Atlantic area for
19 more than 20 years. It is the only safe effective compound avail-
20 able for this purpose. The lima bean industry could not exist in
21 this area without the availability of maneb to control downy mildew
22 outbreaks; the continued registration of maneb should and must be be
23 maintained.

24
25 The EBDC fungicides are the only effective fungicides now
26 available for the control of a number of diseases which can limit
27 production of collards, eggplant, endive, escarole, kale, kohlrabi,

1 lentils, romaine, rutabaga, and Swiss chard. Economic production of
2 these crops cannot continue without the availability of the EBDC
3 fungicides.

4
5 Leaf spot diseases of peanuts must be controlled to prevent
6 serious reductions in yields. A number of fungicidal compounds are
7 being used to control these diseases. The EBDC fungicides are used
8 on approximately 20% of the peanut acreage. The effectiveness of
9 the current peanut disease control program would not be greatly
10 diminished if the EBDC fungicides were no longer available. However,
11 these fungicides have a long history of safety and proven
12 performance and their use should be allowed to continue.

13
14 Potatoes

15
16 Fungicides are used to control the following major potato dis-
17 eases in the U. S.: (1) seedpiece decay, (2) early blight, and (3)
18 late blight. EBDC's, because of their extensive use history, effi-
19 cacy, availability, and low cost, account for approximately 65% of
20 all seedpiece treatment, 65% of all late blight treatment, and 60%
21 of all early blight treatment in the U. S. This amounts to an esti-
22 mated $6-7 \times 10^6$ lb active EBDC applied to an estimated 1,156,000
23 acres one or more times for foliar blight control and to 1,078,000
24 acres as seedpiece treatment. The viable alternatives are captafol
25 and chlorothalonil as foliar blight sprays and captan as seedpiece
26 treatment. Captafol and chlorothalonil are at least as effective
27

as EBDC's for early and late blight control but captan is not as effective as a seedpiece treatment. EBDC's are generally equivalent to all alternatives with respect to the following characteristics: (1) protectant efficacy, (2) lack of phytotoxicity, (3) lack of acute human toxicity, (4) absence of fungal resistance, and (5) broad spectrum activity. EBDC's are superior to all viable alternatives with respect to cost. The long use history with relative safety and continued efficacy, lower cost, and the fact that the harvested crop is not directly treated, combined with limited viable alternatives argue for maintaining EBDC registration for potatoes.

Mushrooms

Zineb is used as a fungicide on mushrooms to enhance both quantity and quality of production. The effect of its cancellation would be felt directly and immediately by growers through increased costs and lowered production and returns, and by consumers through higher prices and lower quality (particularly of fresh mushrooms). Magnitudes of these effects would depend upon regulatory decisions as well as upon production and marketing parameters that are not precisely known.

Because it is a fungus itself, the mushroom is particularly susceptible to fungal diseases that thrive under the environmental conditions needed for optimum mushroom production.

1 The most severe of these diseases is Verticillium (dry bubble
2 disease) for which zineb is the only effective defense. Zineb is
3 also effective against other fungal pathogens such as Dactylium
4 (mildew), Mycogone (wet bubble), and Trichoderma (green mold), as
5 well as at least one viral infection (Lafrance disease).

6
7 There are no presently known alternatives to zineb in mushroom
8 culture. At one time, benomyl was regarded as a very promising
9 alternative but tolerance of Verticillium to benomyl developed very
10 rapidly. Tolerance often has occurred at commercial mushroom farms
11 in as little as 9 months or less of continued benomyl usage.

12
13 Use of environmental suppression by such methods as reduction
14 of temperature and humidity are impractical because these environ-
15 mental conditions are the very ones that are most crucial to favor-
16 able development of the mushroom.

17 18 Fruit

19
20 The EBDC fungicides maneb, mancozeb, metiram, and zineb are
21 widely used on many tree fruits and small fruits because of the
22 relatively inexpensive broad spectrum control.

23
24 The EBDC's are particularly beneficial for control of several
25 major eastern apple diseases: bitter rot, black rot, white rot, and
26 rusts. They are well adapted to integrated mite control program on
27 apples because of their safety to predaceous insects and predaceous

1 mites and compatibility with most commonly used apple insecticides
2 and other fungicides. Compatibility with benomyl and oil uniquely
3 suits them for tank-mixing to reduce the threat of benomyl-resistant
4 fungi, a characteristic which is particularly important in the
5 northern apple growing regions. In the mid-Atlantic and lower
6 mid-Western States, EBDC's are preferred particularly because of
7 their utility in integrated pest management programs and long-term
8 control of summer fruit rots. In the Southeast, EBDC's are the only
9 fungicides that will adequately control the fruit rots prevalent
10 under the warm humid growing conditions. Disadvantages of the major
11 alternative apple fungicides which limit their adaptability to spray
12 programs include: phytotoxicity to fruit or foliage, toxicity to
13 predatory mites and predatory insects, incompatibility with other
14 spray materials such as oils, fungal resistance, questionable
15 availability, and uncertain registration situations.

16
17 Because of their broad spectrum economical control other
18 important uses of EBDC's on fruits include: zineb on plums and
19 prunes in the East for black knot disease, zineb and mancozeb on
20 pears in the Northwest for pear psylla nymph control, zineb on hops
21 in the Northwest for downy mildew control, mancozeb and maneb on
22 grapes for control of fruit rots and downy mildew in several
23 locations, zineb on oranges in Florida for greasy spot and fruit
24 russet, and several EBDC's on minor acreage small fruits and home
25 fruits and nuts.
26
27

1 Cereal Crops

2
3 The EBDC fungicides are used on the small grain (wheat, barley,
4 and oat) crops as a seed treatment and as a foliar protectant.

5
6 The use of EBDC fungicides as seed treatment is not as effec-
7 tive as were the alkyl mercuries (no longer registered). The com-
8 mercial seed treating equipment has had to be modified or new
9 equipment purchased to apply the EBDC fungicides to small grains.
10 At present the EBDC's are the most commonly used cereal treatments.
11 Over a 10-year period average yields were increased by 4.1 bushels
12 per acre.

13
14 For seedling disease, there is no way to establish an economic
15 threshold until after the fact. Most of the seedling diseases are
16 directly tied-up to the micro-environment occurring in the soil-seed
17 association at this time of planting. Not to use seed treatment is
18 to progress backwards.

19
20 The use of the EBDC fungicides as a foliage protectant against
21 infection by Septoria spp., Helminthosporium spp. and the rust fungi
22 is a world-wide practice. The practice and development of applica-
23 tion techniques have been developed by myself and others in the
24 early 1960's. Over a period of years cereal crop protection has
25 averaged 28% yield increase over untreated crop. Unfortunately,
26 there is no method for predicting the potential crop loss before it
27 is too late to apply disease control practices.

1
2 The wildrice crop is extremely susceptible to several leaf-spot
3 diseases that in most years are the limiting factor in crop produc-
4 tion. The use of EBDC fungicides results in an increased cash
5 return to the grower in excess of \$400.00 per acre.

6
7 The practice of growing cereal grains, since the first observa-
8 tion of seed treatment effects, has utilized the concept of inte-
9 grated pest management in the plant disease control area. Crop
10 rotation, seed treatment, resistant varieties, foliar protection,
11 and certified seed are all part of the integrated disease control
12 program to produce the most crop per acre. The EBDC fungicides are
13 a major tool in the cereal crop production program.

14
15 Ornamentals

16
17 Zineb is the EBDC most broadly registered and labeled for use
18 by all segments of the ornamentals industry. Mancozeb is becoming
19 more useful, as new research to add more uses to the ornamentals
20 label progresses. The overall benefits of EBDC fungicides in orna-
21 mentals are their widespread usefulness on many diseases, the fact
22 that they are not usually phytotoxic, they are readily available,
23 and they are not expensive. Furthermore, the long use histories of
24 these materials, significantly increase the confidence the orna-
25 mentalist has in using the materials on high value plants in some-
26 times unique growing or use situations.

Major EBDC benefits include control of the many rust diseases on woody and herbaceous ornamentals, prevention of anthracnose on shade trees, protection of chrysanthemums, gladiolus, and foliage plants from many diseases. There are a few EBDC uses on ornamentals for which there is no alternative material registered. However, the essentiality of EBDC uses on ornamentals is more clearly seen when one analyzes the disadvantages of the registered alternatives and adds this to those uses which have no alternative. Ornamentals require pesticides that give high levels of disease control because of the high value of the crops and the fact that any disease occurrence that detracts from the beauty of the plant can seriously lower market values of the crops. The same concept of detracting from beauty also comes to bear in evaluating alternatives that may leave residues or be phytotoxic to the plant in any way. Many of the EBDC alternatives are not as efficacious and are phytotoxic on many crops. Finally, the oftentimes narrow spectrum of activity or existent labeling of EBDC alternatives limits their usefulness to a nurseryman, landscaper, greenhouse floriculturist, or homeowner, who may be attempting to protect many different plant types from many different diseases.

Grass Seed

The large majority of turfgrass and other seed production is concentrated in Washington and Oregon. It is estimated that 270,000 acres of grass seed production fields were maintained in Washington

1 and Oregon in 1977. Control of foliage, culm, and crown diseases is
2 crucial to successful seed production. It is estimated that 50,000
3 acres of bluegrasses and ryegrasses for grass seed production were
4 sprayed with the maneb and maneb plus nickel sulfate fungicides in
5 1977 for control of stem rust, strip rust, and leaf rust (Puccinia
6 sp.).

7
8 The maneb materials are formulated as wettable powders. Two to
9 four sprays per growing season may be applied depending on disease
10 severity. These are applied at the rate of 1.6 to 2.4 lb. per acre
11 of active ingredient in 50-100 gallons of water per acre.

12
13 In 1976 and 1977 in Washington and Oregon, grass seed yields
14 ranged from 400-1000 lb. per acre where maneb treatments were
15 applied. Without maneb seed yields were 100-300 lb. per acre
16 (Dr. John R. Hardison); the rust diseases were primarily rsponsi-
17 ble for these losses.

18
19 Without the use of maneb the seed crop cannot be profitably
20 produced in areas with foliar disease problems.

21 22 Turfgrass

23
24 The importance of disease control in turfgrass culture has in-
25 creased concurrently with the rising quality standards. Intense
26 usage of these turf areas due to the leisure time recreation
27

1 explosion has necessitated comprehensive disease control practices
2 which include fungicide treatment.
3

4 Maneb, mancozeb, and a lesser amount of zineb are among the
5 major fungicides used throughout the U. S. for control of Helmintho-
6 sporium pathogens. Smaller amounts are used for Rhizoctonia and
7 Pythium diseases.
8

9 The maneb and mancozeb products are highly effective against
10 the Helminthosporium diseases. They are the lowest cost fungicides
11 available for the turf usage both in terms of price per pound as
12 well as in price per unit area of turfgrass treated.
13

14 EBDC fungicide usage on turfgrasses will vary with the diseases
15 to be controlled, the geographic location, and weather situation.
16 Total number of EBDC applications in one growing season may range
17 from one to ten. It is not possible to compute a meaningful average
18 for either number of applications or dosages on a regional or nation
19 wide basis.
20

21 Effective alternatives to the EBDC compounds are available and
22 are used by turfgrass managers to varying extents depending on the
23 material and diseases to be controlled. The alternatives are from
24 2 - 5 times more costly than the EBDC materials when used at equiva-
25 lent rates to obtain similar levels of efficacy (Table 1).
26
27

At present chlorothalonil (Daconil 2787®), cycloheximide (Actidione®) and anilazine (Dyrene®) are the only three other fungicides with a high degree of activity against Helminthosporium. The loss of EBDC materials would accentuate potential fungicide resistance problems by increasing selection pressure for survival of strains resistant to the three alternatives.

Forestry

The forest industry does not consider it economically feasible to apply protectant fungicides to forest stands. The largest quantity of EBDC fungicide use on a forest product is nabam as a slimicide in the wet end of pulp and paper mills. Precise use figures are not available. Total slimicide use (all fungicide) is around 4 million pounds.

In 1976 about 150,000 lbs of maneb were used to control needle cast of Christmas trees in 10,000 acres of plantings. A very small amount of maneb is used to control Herpobasidium blight of honeysuckle in windbreak plantings in the Plains States. Finally, about 4,000 acres of tree seedling nurseries are treated annually with maneb to control needle casts, anthracnose, and leaf spot diseases. Since regeneration of the nations' forests depends upon nursery tree production, such a use is more important than may be realized with casual analysis.

INTRODUCTION

Definition of EBDC Fungicides

EBDC (ethylenebisdithiocarbamate) refers to a class of fungicides which includes nabam (Dithane D-14), maneb (Dithane M-22, Manzate), mancozeb (Dithane M-45, Manzate 200), zineb (Dithane Z-78) metiram (a mixture of Zinc NH_4 and ZnSDC) (Polyram), and diammonium EBDC (Amobam). Table 1 gives those names accepted for use in the ingredient statement on pesticide products as required by FIFRA regulations. Each is based on dithiocarbamic acid. They are used extensively in agriculture--on many fruits, vegetables, and field crops, turfgrass, seeds, and ornamentals--for the control of blights blotches, mildews, molds, rots, rusts, and other fungus-incited diseases. They have been in use for nearly 30 years. Domestic producers include DuPont, FMC, Pennwalt, Roberts Chemical, and Rohm and Haas. EBDC products are also manufactured in other countries and some are imported into the United States.

History of EBDC Fungicides

Up to the late 1930's, inorganic fungicides were the only materials widely available to the grower for the protection of agricultural crops from fungal diseases. Of these, Bordeaux mixture, a combination of copper sulfate and lime, was the most versatile. It

1
2 was widely used since its discovery in 1882 by Millardet in France.
3 It replaced sulfur as a standard on many crops.
4

5 However, Bordeaux mixture suffered several problems. First, it
6 was phytotoxic to the plants on which it was used at the effective
7 application rates. It had a corrosive effect on the grower's spray
8 equipment and frequently clogged nozzles. It was difficult to make
9 up, because it entailed rather precise mixing of copper and lime in
10 the spray tank. Finally, it left a heavy and noticeable residue on
11 plant surfaces.
12

13 Aside from the copper compounds, the only other fungicides
14 available in the early 1940's were lime-sulfur, sulfur dust and the
15 wettable sulfurs which were used on fruit and vegetable crops for
16 scab and crown rot and powdery mildews, and inorganic mercurial com-
17 pounds which were used in the seed treatment of grain. Sulfur is
18 still widely used today, especially to control powdery mildews.
19

20 Because of World War II, which placed a high priority on copper
21 and mercury, there appeared a great demand for adequate substitute
22 fungicides. The first derivative of a dithiocarbamate to achieve
23 prominence was tetramethylthiuram disulfide, later called thiram.
24 Next came the metal salts of dithiocarbamic acid.
25

26 The first reports of the metal salts of dithiocarbamic acid
27 as successful field fungicides appeared in 1942 (Anderson, 1942;

1 Kincaid, 1942) when it was reported that ferric dimethyldithio-
2 carbamate (ferbam) successfully controlled downy mildew on tobacco
3 in seed beds. In comparison with the old recommendations of 12-16
4 lbs of sulfur per 100 gallons of spray, the use of ferbam at 1-1/2
5 lb per 100 gallons seemed strikingly effective, although it left an
6 unsightly black residue on plant surfaces, its potential for crop
7 injury was much less than that of the copper sprays or sulfur.

8
9 The promising control of early blight and anthracnose on
10 tomatoes and early blight on potatoes achieved with zinc dimethyl-
11 dithiocarbamate (ziram) was reported in 1944 (Heuberger and
12 Wolfenbarger, 1944; Wilson, 1944).

13
14 Disodium ethylenebisdithiocarbamate (nabam) appeared in 1943
15 (Dimond, et al., 1943). Instability of nabam was a problem until
16 the stabilizing effect of adding zinc sulfate to the spray tank was
17 discovered. Its acceptance was rapid, and it became widely used for
18 many vegetable diseases. The next step naturally followed - the
19 manufacture of zinc ethylenebisdithiocarbamate itself, known as
20 zineb. It became commercially available in the mid 1940's and was
21 eventually developed for use on approximately 65 crops for 416
22 diseases.

23
24 In 1956, manganese ethylenebisdithiocarbamate (maneb) was field
25 tested on potatoes and later on other vegetable crops. It became
26 known as maneb. It was introduced commercially in the early 1960's.
27 It was similar to zineb in its effectiveness as a fungicidal agent

1 on a number of crops, and better than zineb on many others. It is
2 currently registered for use against 420 diseases on 72 crops.
3

4
5 In the early sixties a coordinated complex of the zinc and
6 manganese salts of ethylenebisdithiocarbamate, named mancozeb, was
7 introduced. It represented an even further improvement in the
8 evolution of EBDC's, combining many of the benefits of zineb and
9 maneb in one product. It is now labelled for use on 51 crops for
10 268 diseases.

11 12 General Qualities and Usefulness of EBDC's

13
14 In four years, from the time of its introduction in the mid
15 1940's, zineb replaced Bordeaux mixture as the standard fungicide on
16 many crops in the United States. Within several more years the
17 EBDC's had replaced Bordeaux, except in special situations, through-
18 out the world. Such tremendous acceptance occurred because the
19 EBDC's provided the growers for the first time with a good broad
20 spectrum fungicide with no significant phytotoxic side effects. In
21 addition, Powell and Shurtleff stated that the importance of this
22 group of fungicides is emphasized by the fact that they controlled
23 fungi that heretofore had not been effectively controlled by sulfur
24 or copper compounds (1976). The rust diseases on fruits or orna-
25 mentals are good examples. Also, later chapters of this report will
26 show that diseases caused by species of Botrytis, Septoria, Alter-
27 naria and anthracnose fungi were more adequately controlled.

1
2 For example, the production of potatoes, the most important
3 vegetable in the world, has been increased dramatically since the
4 introduction of EBDC fungicides. While it took the first 45 years
5 of this century to increase the potato yield in the United States
6 some 30% (from 91.8 bu/acre in the period 1901-1905 to 140.9 bu/acre
7 in the period 1941-1945), potato yields increased almost 90% in the
8 next nine years (to 208 bu/acre by 1954), (McNew, 1959). EBDC's
9 along with the introduction of organic insecticides, improved
10 spraying techniques, and new fertilizers had a hand in this
11 increase.

12
13 Whereas all of these factors contributed to increased yields,
14 EBDC's may well be the largest single factor. For instance,
15 Heuberger and Manns (1943) reported in a test in Delaware with
16 Dakota Red potatoes a 21% yield gain for nabam (Dithane D-14) plus
17 $ZnSO_4$ plus lime, as compared with the use of Bordeaux mixture
18 (the standard fungicide up to that time). Later on, Heuberger
19 (1946) reported a 32% yield increase on potatoes grown in Delaware
20 and treated with Dithane Z-78 (zineb).

21
22 Heuberger (1967) found in the mid 1940's that EBDC's gave
23 control superior to copper compounds on tomatoes for all five of the
24 common diseases -- the early blight, Stemphylium leaf spot, anthrac-
25 nose, Septoria leaf spot, and late blight. The EBDC's also in-
26 creased yields 2-3 tons per acre. Yield increases were also
27 reported on cucurbits (25% or more) and celery. Yield increase

1 studies were also conducted by researchers on many crops including
2 apples, corn, small grains, bananas, peanuts, and ornamentals.

3
4 There are no commercial fungicides which have as broad a target
5 spectrum on as many crops as those in the EBDC class. There are
6 substitutes for particular uses on particular commodities, but they
7 are often less effective, more costly, or have more undesirable
8 properties than the EBDC products.

9
10 EBDC's are compatible with most pesticides. This is important
11 when incorporating them in total pest management--or integrated pest
12 management--programs. For instance, in apple production the EBDC's
13 are compatable with spray oils, and miticides, but are not toxic to
14 the natural predators of the apple mite.

15
16 Finally, EBDC's are useful to combat the plant pathogens that
17 are developing resistance to many of our more specific fungicides.
18 As an example, the apple scab fungus has become resistant to other
19 fungicides in many areas. As integrated pest management programs
20 increase in use, the need for growers to use a general fungicide to
21 quickly avert problems due to pathogen resistance will be ever more
22 important.

23
24 Products Containing EBDC Fungicides

25
26 Our examination of current EPA microfische label files indi-
27 cates that combined totals of all six EBDC materials amount to

1 271 crop registrations for 1,296 diseases, divided among 876
2 different products registered by 206 different companies (Table 2)!
3 According to Farm Chemical Magazine (September, 1977) dithio-
4 carbamate fungicides accounted for \$50 million of a total \$116
5 million U. S. fungicide market for 1974. Chemical and Engineering
6 News of September 5, 1977, states that this market is growing by
7 7.3% per year. Thus, in 1977 the market would be about \$61.75
8 million. Using this and other sales information, the assessment
9 team estimates that at least 27 million pounds of EBDC fungicides
10 are currently being used in this country each year. Recent
11 compilations by several companies give yearly sales figures of 255
12 million pounds worldwide (out of a total of 460 million pounds of
13 fungicides sold each year throughout the world).
14

15
16 The fact that so many registrants, so many products, and such
17 widespread uses of EBDC's exist makes detailed analysis of EBDC uses
18 impossible to analyze from the point of view of product distribution
19 and sales. In an attempt to overview the registrant - product
20 status, the assessment team wrote to each of the 209 registrants on
21 the EPA registrant list that appeared with the RPAR in the Federal
22 Register. Thirty-four percent of the 209 registrants responded with
23 comments concerning 33% of the 865 products. Although this was not
24 a great percentage of the total possible responses, a breakdown of
25 the types of responses should help to illustrate and clarify the
26 complex nature of EBDC registrations.
27

1
2 Over 50% of the responses (161 products) concerned products de-
3 signed as foliar sprays on agricultural crops. The uses of these
4 products were quite diverse, as is evident from the total registra-
5 tion picture mentioned above. Potato seedpiece treaters (primarily
6 using dusts) represented 5% (or 13) of the product responses.
7 Another 5% (or 14) were made up of products for water treatment in
8 closed systems (pulp, sugar cane, cooling towers, etc.) for
9 slimicide control.

10
11 Thirty-eight percent of the registrants responding were selling
12 yard and garden products for use by homeowners. The numbers of such
13 products represent 32% or 88 products. All of the registrants
14 considered these products active in their product line, many stating
15 that they were essential to the offering of a full service package.
16 Very few registrants were able to cite alternative fungicides that
17 they could substitute, although all did say an alternative would
18 have to be sold. Sales information was offered by some registrants,
19 but the data were too incomplete to benefit our analysis. It was
20 clear from the responses that manufacturers of yard and garden
21 pesticides would be seriously hurt by the removal of EBDC containing
22 products. The fact that EBDC's are non-proprietary, inexpensive,
23 compatible with other pesticides, broad spectrum, and of low
24 phytotoxic potential are quite important to this group of
25 registrants.
26
27

WORLD USE OVERVIEW

Although the purpose of this report is to discuss EBDC fungicides with respect to their use in the United States, a brief discussion of world-wide use patterns is necessary for a complete analysis of benefits. Any restrictions placed on the EBDC fungicides in the United States may result in an unfair competitive advantage to U. S. producers on the world market. Export value to U. S. agricultural commodities is currently estimated at \$23 billion annually, and does much to balance the expenditures for imported energy. Foreign producers will continue to use the EBDC fungicides, whereas U. S. producers may be forced to use more expensive alternatives. This would result in higher priced U. S. exports and a reduction in the volume of exports.

The estimated U. S. useage of the EBDC fungicides is between 25 - 27 lb. annually. World useage is estimated at 255 million lb. (Table 3). With the exception of large useage on foreign grapes for downy mildew control, and for bananas for Sigatoka disease control, world useage patterns on vegetables and other fruits closely follow those in the United States.

World production of bananas for 1975 was 6,641 thousand metric tons (FAO, Trade Yearbook, 1975). EBDC products are used throughout the major banana producing ares of the world to control Sigatoka and other diseases. Rigid residue standards on imported bananas by the

1
2 United States could influence imports. Realizing that the portion
3 of bananas imported into the United States is a fraction of total
4 produced, it is unrealistic to expect other nations to use alterna-
5 tive types of fungicides which do not provide the same broad
6 spectrum of control as EBDC's and which cost more. The same case
7 can be stated for other crops of which U. S. purchases are rela-
8 tively small.

9
10 During 1973/74 about 50% of the total U. S. utilization of
11 fresh tomatoes were imported from Mexico (Simmons, et al., 1976).
12 Mexico and Florida growing conditions and costs of production are
13 similar. Since EBDC's are more economical to use, it is reasonable
14 to assume that Mexico will continue to take advantage of avail-
15 ability of EBDC's and thus further increase its cost advantages.
16 The same situation might occur concerning bell peppers and
17 cucumbers for which imports from Mexico account for 36% and 46%,
18 respectively, of the U. S. market.

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Table 1. EBDC Nomenclature
(Source: EPA Position Document 1 on Ethylenebisdithiocarbamates)

Common Name	Label Chemical Name	Trade Name(s)	CAS Name	CAS Number
1. None	Diammonium EBDC	Amobam®	Carbamodithioic acid, (1,2-ethanedithiolbis-, diammonium salt	3566-10-7
2. Mancozeb*	**	Dithane® M-45 Manzate® 200	[[1,2-Ethanedithiolbis [carbamodithioato]] (2-)]manganese mixture with [[1,2-ethanedithiolbis [carbamodithioato]] (2-)]zinc	8018-01-7
3. Maneb	Manganese EBDC	Manzate® Dithane® M-22	[[1,2-Ethanedithiolbis [carbamodithioate] (2-)]manganese	12427-38-2
4. Nabam	Disodium EBDC	Parzate® Dithane® D-14	Disodium 1,2-ethane-diylbis[carbamodithioate]	142-59-6
5. Metiram*	***	Polyram®	Metiram	9006-42-2
6. Zineb	Zinc EBDC	Dithane® Z-78	[[1,2-Ethanedithiolbis [carbamodithioato]] (2-)]zinc	12122-67-7

* Recognized in Europe but not yet established in the United States. These names will be used in this document for convenience.

** Zinc ion and manganese ethylene bisdithiocarbamate 80%, a coordination product of manganese 16%, zinc 2%, ethylene bisdithiocarbamate 62%.

*** Mixture of 5.2 parts by weight (89.9%) of ammoniates of [ethylenebis(dithiocarbamate)]zinc with 1 part by weight (16.1%) ethylenebis[dithiocarbamic acid], bimolecular and trimolecular cyclic anhydrosulfides and disulfides.

Table 2. Total registrations and product summary for EBDC fungicides.

<u>Chemical</u>	<u>Crop</u>		
	<u>Registrations</u>	<u>Number of Diseases</u>	<u>Number of Products*</u>
Diammonium EBDC	21	47	2
Nabam	44	104	51
Mancozeb	51	268	110
Maneb	72	420	306
Zineb	65	416	354
Metiram	<u>18</u>	<u>41</u>	<u>53</u>
Totals	271	1296	876

*Number of separately labelled proprietary formulations, including those containing EBDC's alone or in combination with other pesticides. Taken from EPA label microfiche files.

Table 3. Estimated world uses of EBDC fungicides in 1975*

Crops	Millions of Pounds
Plantation Crops	4.410
Bananas	9.875
Fruits and Nuts	27.344
Rice	3.518
Major Field Crops	10.713
Vegetables	35.692
Potatoes	60.463
Tomatoes	19.267
Seed Treatment	3.509
Turf and Ornamentals	0.650
Vineyards	79.996
Total All Uses	255.320

*Based on assessment team compilations and sales estimates by Rohm and Haas Chemical Company.

Vegetables

Vegetables are grown in every state of the Union. In 1976 there were 3.2 million acres of vegetables (exclusive of potatoes) planted. It is estimated that the same acreage will be planted in 1977 and that there will be an estimated 10,000,000 lb. of EBDC fungicides used. Approximately 8,000,000 lb. will be used by as well as commercial growers. Approximately 8,000,000 pounds will be used east of Mississippi with at least half of it to be used in Florida alone. Approximately 2,000,000 lb. will be used west of Mississippi with 1/4 of it used in California vegetable production. These fungicides are used extensively by home gardeners as well as commercial growers, but precise areas of need and total use figures are not available.

The EBDC fungicides are used to control most of the major foliar pathogens of vegetables in the United States. The total economic importance of vegetable diseases must be measured not only by the actual damage that they cause but also by the cost of disease control. It is next to impossible to accurately calculate the dollar cost that diseases impose upon vegetable industry. Data show that maneb, maneb plus zinc, and mancozeb are generally superior to most labeled alternates on the major diseases of vegetables. The only alternatives, for the most part, that are outstanding for some major vegetable diseases, are chlorothalonil and captafol (Table 1).

Sweet Corn

The most serious diseases of sweet corn which are controlled with EBDC's in the U. S. are northern leaf blight, caused by Helminthosporium turcicum Passerini, southern leaf blight caused by Helminthosporium maydis Nisik and Miyake, and corn rust caused by Puccinia sorghi Schweinitz (19, 20, 21).

In 1976, 183,100 acres of sweet corn were planted in the United States and treated with EBDC fungicides. In Florida, 973,000 pounds were used extensively for control of leaf blight and corn rust (Table 2). Zineb, metiram, captafol, and chlorothalonil are registered on sweet corn but are not used because of the higher program cost (Table 2). Applications of EBDC fungicides to sweet corn consist of an average of 11 treatments per crop applied at the rate of 1.2 lbs. a.i./acre/treatment.

Snap Beans

Bean anthracnose [Colletotrichum lindemuthianum (Saccardo and Magnus) Scribner] and bean rust (Uromyces phaseoli typica Arthur) are serious diseases of snap beans which are controlled with EBDC fungicides. Anthracnose is almost worldwide in distribution. However, it is rarely found in the dry-land or surface-irrigated seed areas of the western United States. Bean rust is found in every country and state where beans are grown intensively (27).

1 In 1976, 339,000 acres of snap beans were planted in the U. S.
2 In Florida, 38,900 acres were planted, and 37,500 acres were treated
3 with EBDC fungicides. There are 457,500 pounds of EBDC fungicides
4 used on this crop annually. EBDC fungicides are a major component of
5 disease control programs on snap beans. During the 10 years prior to
6 widespread use of EBDC fungicides on snap beans, and average yield was
7 29.0 cwt/acre. After 10 years with EBDC fungicide use, the yield rose
8 10.7% to 32.1 cwt/acre. Other changing production practices have
9 contributed to yield increases, but EBDC fungicide use appears to be
10 the primary cultural practice resulting in these increased yields.

11
12 Maneb, maneb plus zinc are used extensively for control of
13 anthracnose and bean rust on snap beans. Chlorothalonil is the only
14 alternative useful for bean rust control. Zineb is labeled for
15 anthracnose bean rust, but is no longer widely used. Applications
16 of maneb, and maneb plus zinc fungicides to snap beans average 5.8
17 treatments per crop applied at the rate of 1.2 lb. a.i./acre/-
18 treatment at the program cost of \$13.27/acre. Zineb treatment also
19 averages 5.8 applications per crop applied at the rate of 1.5 lb.
20 a.i./acre/treatment at a program cost of \$16.59/acre. Chlorothalonil
21 for rust control is applied just as frequently at the rate of 2.25
22 lb. a.i./acre/treatment at a program cost of \$60.90/acre.

23
24 Celery

25
26 Early blight and late blight are the most serious diseases of
27 celery which are controlled with EBDC fungicides.

1 Early blight, caused by Cercospora apii, is known to occur in
2 every country where celery is grown intensively (71). Late blight
3 of celery caused by Septoria apii and Septoria apiigraveolentis is a
4 devastating disease found in all celery production areas of the
5 world (15). Early infection by these two fungi destroys the entire
6 crop long before harvest time. Septoria predisposes the celery
7 stalks to Aclerotinia while in storage. This disease destroys the
8 stalks before they can be marketed.

9
10 In 1976, 34,910 acres of celery were planted in the United
11 States. In Florida, 10,900 acres were planted and all were treated
12 with EBDC fungicides. Maneb, maneb plus zinc, and mancozeb are used
13 extensively for the control of celery early blight and late blight.
14 Zineb, metiram, benomyl, chlorothalonil, copper, ferbam, thiram, and
15 dichlone are all labeled for control of these disease (Table 3).
16 Use of EBDC fungicides on celery in Florida consists of an average
17 of 20.2 applications per crop applied at the rate of 1.2 lb.
18 a.i./acre/treatment. Florida uses 314,000 lb. of EBDC fungicides
19 annually; 96.5% of all celery growers in Florida use EBDC's in
20 disease control programs. During the 10 years prior to widespread
21 use of EBDC on celery, yields averaged 295 cwt/acre. They rose to
22 388.4 cwt/acre during the following 10 years, due in large part to
23 the use of these more effective fungicides. In California, 20,050
24 acres of celery were planted and 4,010 acres were treated with EBDC.
25 Applications of EBDC to celery in California consisted of 7
26 treatments per crop at the rate of 1.2 lb. a.i./acre/treatment.
27

Peppers

Phytophthora blight, frog-eye spot, and anthracnose are diseases on peppers having varying degrees of importance throughout the United States. All three disorders are generally controlled with EBDC fungicides. Phytophthora blight caused by Phytophthora capsici is found in many of the pepper production areas of the world (44, 63, 69, 70). Frog-eye spot caused by Cercospora capsici is the most common leaf spot on peppers (12, 69). It is found throughout most of the pepper production areas in the world. When the disease is severe, it can produce almost complete defoliation of an entire field. Anthracnose caused by Gloesporium piperatum is found in many of the pepper production areas. Overhead irrigation greatly increases the severity of the disease by prolonging the period of favorable humidity and washing off of the protective fungicides.

In 1976, 57,000 acres of peppers for fresh market and processing were planted in the United States. In Florida, 17,600 acres were planted and 12,200 acres (60%) were treated with EBDC fungicides. Maneb, maneb plus zinc, and zineb are used extensively for the control of frog-eye spot, and anthracnose. Phytophthora blight is also controlled in this spray program. Some copper fungicides are the only alternative and it is only recommended for frog-eye spot (Table 4). Applications of EBDC fungicides to pepper average 7.6 treatments/crop. Maneb or maneb plus zinc is applied at the rate of 1.2 lb. a.i. Zineb is applied at the rate of 1.5 lb. a.i./acre/treatment. In Florida, 214,400 lb. of EBDC fungicides are used

1 annually on peppers. The EBDC fungicides are a major part of most
2 pepper disease control programs. Prior to the acceptance and
3 widespread use of EBDC fungicides, the 10-year average yield of
4 pepper was 65.8 cwt/acre. In the past 10 years, the yield has
5 increased 18.8% to 88.2 cwt/acre. It is generally recognized that a
6 great deal of this yield increase was due to the use of the more
7 efficacious EBDC materials.

8 9 Cabbage

10
11 Alternaria leaf spot and blight caused by Alternaria brassicae
12 (Berkeley) Saccardo and downy mildew caused by Pernospora parasitica
13 (Persoon) Fries are probably the most persistent and damaging of the
14 cabbage diseases which are controlled by EBDC. Alternaria leaf spot
15 and blight is almost worldwide. Infected seedlings used as trans-
16 plants never grow as large as normal nor do they yield well. If
17 infection is delayed until plants are older, the spots usually occur
18 on the older leaves and are not generally economically important
19 unless the spotting is severe enough to require extensive trimming
20 as the cabbage is placed in storage. Downy mildew is especially
21 common in California. Its severity varies from year to year
22 depending upon weather conditions.

23
24 In 1976, 106,420 acres of cabbage for fresh market and proces-
25 sing were planted in the United States. In 1976, 18,100 acres were
26 planted in Florida and 16,670 (92%) treated with EBDC fungicides.
27 California planted 7,700 acres and 3,080 were treated with EBDC

1 fungicides. Maneb, maneb plus zinc, and zineb are used extensively
2 for the control of Alternaria leaf spot and downy mildew in the
3 United States. In Florida 121,500 lb. of EBDC fungicides are used
4 on cabbage annually. EBDC fungicides are a major part of the dis-
5 ease control programs in Florida on this crop (Table 5). Use of
6 EBDC on cabbage in Florida consists of an average of 4.9
7 applications/crop applied at the rate of 1.2 lb. a.i. for maneb,
8 maneb plus zinc, and 1.5 lb. a.i. of zineb/acre/treatment.

9 10 Fresh Tomatoes

11
12 Fungicidal sprays are used to control four major foliar patho-
13 gens of tomatoes: Alternaria solani (Ellis and G. Martin), Jones
14 and Grout, Cladosporium fulvum Cooke, Stemphylium solani Weber, and
15 Phytophthora infestans (Mont) deBary. Foliar sprays are used to
16 control one or more of these pathogens which attacks tomatoes in the
17 12 major tomato production states.

18
19 Early blight caused by A. solani can be a devastating disease
20 which is present in almost all states and countries where tomatoes,
21 eggplant, and potatoes are grown (53). It reaches epidemic propor-
22 tions in areas with high rainfall with temperatures in the range of
23 75° to 85° F (49). Tomatoes are sprayed regularly in most
24 production states, begining at plant emergence of direct seeded
25 fields or soon after plant establishment of transplants. In
26 California, early blight is a problem in fields with overhead irri-
27 gation or when unseasonal rains are encountered, such as occurred in

1 early 1978. Most of the commonly used fungicides, such as mancozeb,
2 maneb, maneb plus zinc, zineb, ziram, metiram, captan, captafol,
3 folpet, chlorothalonil, and anilazine can be applied for early
4 blight control. The large number of chemicals is desirable because
5 the tomato spray schedules in most tomato production areas are
6 always built on the assumption that anthracnose, late blight, and
7 leaf mold may be present and, thus, broad spectrum crop protection
8 is necessary. Maneb, maneb plus zinc, and mancozeb control all
9 three of these diseases, unlike many of the alternative materials
10 occasionally used in the spray program.

11
12 Tomato late blight caused by P. infestans (Mont) deBary is one
13 of the most widespread plant diseases known to man. This pathogen
14 can bring quick devastation to a tomato crop (9). Infected fruits
15 are invaded by secondary fungi and soft-rot bacteria resulting in
16 fruit disintegration. In some tomato production areas fungicide
17 sprays are not necessary to protect the crop from late blight for
18 the entire season depending on the temperature, moisture, and
19 presence of the fungus. Thus, a forecast system is utilized and
20 disease control costs are reduced (16, 30). As was the case for
21 early blight, maneb, maneb plus zinc, and mancozeb are the foremost
22 fungicides used for control of late blight.

23
24 Leaf mold of tomato (caused by Cladosporium fulvum) is world-
25 wide and causes a great deal of injury to winter grown crops in
26 greenhouses. In Ohio, 40 percent of the greenhouse acreage is
27 sprayed 2 to 3 times with EBDC's for control of leaf mold. In

1 fields protection is needed during wet, moderately cool seasons (7).
2 Chemicals which have been proven effective in disease control in the
3 field are maneb, maneb plus zinc, mancozeb, zineb, benomyl, captan,
4 and chlorothalonil. The only alternative chemical in greenhouses is
5 benomyl.

6
7 Grey leaf spot was found first in Florida with a northern range
8 to Indiana and Illinois (26). It is a serious problem in Hawaii and
9 Central America. The fungus may be found on seedlings as well as
10 mature plants. Varying degrees of severity can occur from a single
11 leaf spot to complete defoliation of the plant. The fungus is
12 favored by hot, wet weather and having the plants weakened by a
13 heavy fruit load or fertilizer--depleted soil. The effective chemi-
14 cals for disease control are maneb, maneb plus zinc, mancozeb,
15 zineb, ziram, metiram, captan, captafol, chlorothalonil, and
16 anilazine.

17
18 In 1976, 11 states planted 109,800 acres of fresh market
19 tomatoes and 72,305 were treated with EBDC fungicides (Table 6).
20 The number of applications of EBDC to a crop of fresh tomatoes
21 ranged from 4 in California and Georgia to 22 in Florida (Table 7).
22 The rate of EBDC active ingredient applied ranged from a low of 1.2
23 lb./acre/treatment in North Carolina to a high of 2.4 lb./acre/
24 treatment in Maryland, Virginia, and New York (Table 7). Without
25 the use of EBDC fungicides, crop reductions of 10-20% in California
26 and 20-30% in 9 other states (Table 8) might be expected. It is
27 estimated that the industry could have losses in yield ranging from

1 46 to 118 cwt/acre, if EBDC fungicides were not available and the on
2 substitutes were the copper compounds. Common formulations and
3 costs of formulation of EBDC fungicides and registered alternatives
4 on tomatoes are listed in Table 9. The main objection to the use of
5 equally efficacious alternatives is the higher costs of these
6 materials.

7 8 Processed Tomatoes

9
10 In 1976, approximately 332,500 acres of tomatoes were grown for
11 processing alone (65). About 80% of this acreage was centered in
12 California while most of the remainder was located in Ohio, Indiana,
13 Michigan, New Jersey, Maryland, and Pennsylvania (Table 10). The
14 yield and quality of processing tomatoes are often seriously reduced
15 by a number of fruit and foliar diseases. Early blight caused by
16 Alternaria solani, and anthracnose caused by Colletotrichum pho-
17 moides occur most commonly and account for the major portion of the
18 damage. On occasion, late blight caused by Phytophthora infestans
19 may develop in areas of cool temperatures and cause considerable
20 destruction of acreage. At times, Septoria blight caused by Sep-
21 toria lycopersici and gray leaf spot caused by Stemphylium solani
22 cause considerable foliar damage. In addition, black mold caused by
23 Alternaria alternata, and Botrytis mold caused by Botrytis cinerea
24 can also reduce yields. The damaging effect of all these diseases
25 can be nullified to a large extent by an efficient disease control
26 program. The EBDC fungicides have played an important role in this
27

1 program for processing tomatoes for more than 25 years. At the
2 present time, maneb, and mancozeb are the most widely used EBDC
3 fungicides for tomato disease control in the Eastern United States
4 (Tables 11, 13).

5
6 The available alternatives for the control of various diseases
7 of processing tomatoes are listed in Table 12. Although this list
8 is extensive, captafol (Difolatan) and chlorothalonil (Bravo) are
9 the most frequently used compounds of all the alternative fungi-
10 cides, with chlorothalonil being the preferred of these two.
11 Considerable field research has been undertaken to compare the
12 efficacy of maneb, captafol, chlorothalonil, and other compounds for
13 tomato disease control (6, 10, 23, 33, 41, 43, 60). A summary of
14 data obtained in 10 experiments is presented in Table 14. These
15 results indicate that captafol and chlorothalonil are slightly more
16 effective than maneb in controlling anthracnose and early blight.
17 Other workers have reported similar findings (22, 45, 51, 58, 61).

18
19 One of the big advantages of the EBDC fungicides has been their
20 relatively innocuous effect on the tomato plant. Chlorothalonil and
21 captafol are also noninjurious to tomatoes. However, captafol has
22 certain properties that can be irritating to persons coming in direct
23 contact with this compound. This would readily occur during hand-
24 harvesting. Therefore, the use of captafol is restricted to
25 tomatoes which are mechanically harvested. Captafol is more widely
26 used in California because practically all the tomatoes there are
27

1
2 mechanically harvested. In the East, the majority of the acreage is
3 still handharvested. Chlorothalonil does not exhibit any phyto-
4 toxic properties and only occasionally have reports indicating
5 worker irritations been received.

6
7 The costs per acre of one application of captafol, chloro-
8 thalonil, and EBDC fungicides (maneb or mancozeb) are \$5.00, \$8.93,
9 and \$4.56, respectively. Using captafol would increase slightly the
10 cost of a tomato disease control program; however, one must remember
11 that this compound is restricted to mechanically-harvested tomatoes.
12 Since the majority of tomato acreage in the Eastern United States is
13 hand-picked, the only other possible alternative fungicide would be
14 chlorothalonil. Changing from EBDC fungicides to chlorothalonil
15 would almost double the cost of an effective tomato disease control
16 program. With eight fungicidal applications made during the season,
17 the increase in cost per acre would be at least \$35.00 to achieve
18 the same level of disease control.

19
20 In general, the loss of EBDC's on tomatoes would result in the
21 availability of only one effective compound which could be used for
22 hand-picked tomatoes. Irrespective of the increased costs which
23 would occur with the loss of EBDC fungicides, it would be unwise to
24 rely on just one fungicide for the control of foliar and fruit
25 diseases. In the future, there will be new cultivars and changing
26 cultural practices. These changes might result in introduction of
27 new tomato pathogens, and possible development of resistance by

1 current pathogens. All these factors require some latitude in
2 choice of fungicides.

3 4 Lima Beans

5
6 Lima beans are an important vegetable commodity in the
7 Mid-Atlantic area. The lima bean acreage is primarily located in
8 New Jersey, Maryland, and Delaware with a total of approximately
9 15,000 acres planted and harvested during the 1977 season (65).
10 These lima beans are commonly referred to as "baby limas" and are
11 used exclusively for processed beans (canned or frozen). This baby
12 lima acreage represents a large part of the total production of this
13 crop in the United States.

14
15 Downy mildew (Phytophthora phaseoli) has been a problem of lima
16 beans in the Mid-Atlantic area since the early 1900's (13). The
17 environmental temperature and moisture here are well suited for the
18 development and spread of this disease. Hueberger and Crossan in
19 1958 (18) reported losses of approximately \$200,000 to growers in
20 Delaware from downy mildew infection of lima beans where protective
21 fungicidal sprays were not used. These workers further reported
22 that 13 years of research with copper and organic fungicides showed
23 that maneb was the most effective fungicide for downy mildew control
24 of lima beans. The results obtained in several downy mildew control
25 tests in Delaware (18) are summarized in Table 15. These results
26 showed that the maneb compound was effective in controlling downy
27 mildew and an increase in bean yield was obtained. Downy mildew

1 outbreaks in the mid-Atlantic area occurred 5 times during the last
2 10 years (1968-77). Approximately 60% of the lima bean acreage was
3 treated with an EBDC fungicide during these outbreaks. Growers used
4 an average of 4 applications (7-day schedule) at eht rate of 1.6 lb.
5 a.i./acre/application.

6
7 Copper is the only alternative compound for the control of
8 downy mildew of lima beans. However, it is recommended as an
9 alternative to maneb on only two states. Fifteen states including
10 Delaware, Maryland, and New Jersey do not recommend any alternative
11 compound for downy mildew control of lima beans because of the lower
12 efficacy and phytotoxicity hazards associated with the use of
13 coppers. No phytotoxic effects were observed when maneb sprays were
14 applied to lima beans for downy mildew control in fields tested in
15 Delawre (18). Studies conducted by the Department of Plant
16 Pathology, Rutgers University (8), indicated that copper sprays were
17 injurious to lima beans. In these studies the yields of the
18 copper-sprayed lima bean cultivar Henderson were reduced 27 to 54
19 percent as compared to the untreated plants. It is apparent that
20 maneb is the only acceptable fungicide now available for downy
21 mildew control of lima beans.

22
23 A method has been developed by Hyre (31) for forecasting downy
24 mildew of lima beans in the mid-Atlantic area from rainfall and tem-
25 perature data. Therefore, lima beans do not have to be sprayed on a
26 regular schedule for control of this disease. Another important
27

1 downy mildew control measure used during the last 15 years has been
2 the use of resistant varieties (73). Unfortunately, the mildew
3 pathogen has developed a new race with each new resistant cultivar
4 introduced.

5 6 Peanuts

7
8 Peanuts are an important crop in the United States, parti-
9 cularly in the South. The leaf spots (Cercospora personata and
10 Cercosporidium arachidas) are probably the most serious diseases of
11 peanuts in the United States (32). During the years 1951 to 1960,
12 the average annual loss from these diseases, despite the use of
13 chemical control measures, was estimated at 10 percent (64). A
14 recent report from Wells (72) showed that there was an estimated
15 loss of yield of approximate 8 percent from these leafspot diseases
16 in the major peanut-growing states during the 1975 and 1976 seasons.
17 These losses continue to occur and could exceed 50 percent if
18 chemical control measures were not utilized.

19
20 A number of compounds, in addition to the EBDC fungicides, are
21 used to control these diseases of peanuts. These alternative fungi-
22 cides are: benomyl, chlorothalonil, captafol, dodine, triphenyltin,
23 copper, and sulfur. The EBDC fungicides (maneb and mancozeb) are
24 being used extensively in North Carolina, Oklahoma, Texas, and
25 Virginia. During 1977, approximately three million pounds were
26 applied to about 275,000 acres of peanuts in these states repre-
27 senting 20 percent of the total peanut acreage in the United

States (8, 29, 50, 68, 72). Usually, there are 6 applications at a rate of 1.4 lb. a.i./acre/treatment.

The most widely used alternative compounds are chlorothalonil (Bravo), copper (Kocide), captafol (Difolatan), and triphentin (Duter). Gazaway (24) has reported that these compounds were effective for foliar disease control in tests in Alabama. Chlorothalonil would be the preferred alternative and would be applied 5 times at a rate of 1.3 pts/acre/treatment. Benomyl (Benlate) use is limited because of pathogen resistance. Maneb or mancozeb must be used in combination with benomyl to counteract this problem.

Since many alternative fungicidal compounds can and are being used, a cursory view that the loss of EBDC fungicides would not have an immediate economic impact on the peanut industry (24, 56, 62). The cost of these materials in a disease control program is comparable to the EBDC fungicides. However, over the long run, the effect of the loss of EBDC fungicides could prove to be substantial. Their loss would mean that there would be one less effective fungicide to recommend in a "rotation" program. Horne (29) at Texas A&M recommends that peanut growers use different fungicides within a spray program to avoid the possibility of building up tolerant or resistant strains of the pathogens. He further states that the EBDC fungicides have been used for many years without any loss in effectiveness or any adverse affect upon the peanut crop or environment.

Lettuce

Downy mildew (Bremia lactucae) is a serious disease of lettuce which occurs in all parts of the world where there is adequate moisture and medium to low temperatures. In wet weather the affected leaves often are rotted by saprophytic bacteria or fungi.

In 1976, 155,100 acres of lettuce were planted in California and 38,775 treated with EBDC fungicides. Zineb and maneb are used extensively for the control of lettuce downy mildew. Materials such as chlorothalonil (Bravo), captafol (Difolatan), Dyrene, etc., are not registered for use on lettuce. Applications of EBDC to lettuce consisted of 2.5 applications per crop applied at the rate 1.6 lb. active ingredient per acre per treatment. Without the use of the EBDC fungicides, growers would have suffered a 15-25% loss in yield. Bordeaux mixture, 6:6:100, is an excellent protective fungicide, but it caused injury to plants (14). Liquid copper materials may cause yellowing of wrapper leaves and light brown necrotic areas on leaf and leaf blades with repeated applications (48). It is estimated we could have a 15-25% reduction in grade and quality resulting in a loss to the producer of approximately \$1.00/carton if EBDC fungicides were not available and the only substitutes were the copper compounds. In 1976, 37,300 acres of lettuce were planted in Arizona and 18,650 (50%) were treated with EBDC fungicides. Applications and loss estimates were similar to those in California.

1 Because of the high humidity and ideal conditions for
2 development of downy mildew in Florida, it is necessary to treat
3 100% of the acreage whenever lettuce is grown. In 1976, 9400 acres
4 of lettuce were planted. Growers usually use 2 applications per
5 crop at the rate of 1.6 lb. a.i./acre/treatment. The cost of the
6 fungicide in Florida varies from \$4.58 to \$5.72 per acre. Yield
7 loss and quality grade reductions without EBDC treatments would be
8 roughly the same as that incurred in California and Arizona. No
9 effective alternate fungicides are available for the control of
10 downy mildew of lettuce. Downy mildew strains of the fungus have
11 never developed resistance to the EBDC fungicides. There are no
12 reports of EBDC fungicides causing irritation to humans who have
13 handled the fungicides constantly in the field or by harvesting the
14 treated plants.

15 Spinach

16
17 Downy mildew of spinach (Peronospora spinaciae) is another
18 disease for which EBDC fungicides are needed for control. As far as
19 is known, no effective alternates are available. In severe attacks
20 the entire plant is killed. The disease progresses so rapidly that
21 within a few days the entire field may be destroyed. Resistant
22 varieties are available, but the fungus has the ability to produce
23 new strains which can attack resistant varieties.

24
25 In 1976, 3500 acres of spinach were planted in Texas, and 100%
26 of the acreage was treated for either control of downy mildew or
27

1 white rust (Albugo occidentalis). Zineb or maneb are the EBDC
2 fungicides used most often for control of spinach diseases and 4.5
3 treatments are applied per crop at the rate of 1.6 lb.
4 a.i./acre/treatment. Without the EBDC treatments growers would lose
5 100% of their planted acreage during periods of high disease
6 incidence.

7
8 In 1976, 3280 acres of spinach were planted in the mid-Atlantic
9 States of New Jersey, Maryland, and Virginia, and 2200 acres (65%)
10 were treated with EBDC fungicides. The average number of treatments
11 per crop was 4.5 and 1.6 lb. a.i. of the fungicides were
12 applied/acre/treatment. It is important to restate that there
13 appear to be no alternate fungicides for the control of downy mildew
14 or white rust of spinach. Growers must have the EBDC fungicides for
15 control of these two diseases, if they are to continue growing
16 spinach.

17 Cucurbits

18
19
20 Major diseases of the cucurbit family (watermelon, squash,
21 cucumbers, cantaloupes, calabaza, etc.) include downy mildew caused
22 by Pseudoperonospora cubensis, gummy stem blight caused by Mydo-
23 sphaerella citrullina, and target spot caused by Corynespora
24 cucumerinum. EBDC is used to control the downy mildew fungus on
25 calabaza, which becomes a problem during the fall months, the major
26 production period. Without adequate EBDC preventive sprays, foliage
27 damage occurs resulting in fruit size reduction and number (2, 3, 4,

1 28, 54, 55, 59). Downy mildew of cantaloupe can be a serious
2 disease in Texas and the desert valleys of California during the
3 fall cropping period.
4

5 In 1976, 65,000 acres of watermelons were planted in Florida
6 and 49,200 acres were treated for cucurbit diseases. Six and
7 one-half applications of EBDC fungicides were used per crop at the
8 rate of 1.6 lb. a.i./acre and approximately 412,560 lb. were used
9 during the season; 39,000 acres of watermelons were planted in
10 Georgia and 26,500 acres were treated with EBDC fungicides. Six
11 application of fungicide were applied during the crop season at the
12 rate of 1.6 lb. a.i./acre/treatment; 25,000 acres were planted in
13 South Carolina and 20,000 acres were treated with EBDC fungicides.
14 Five applications of EBDC fungicides were used per crop at the rate
15 of 1.2 to 1.6 lb. a.i./acre/treatment; 35,000 acres of watermelon
16 were planted in Texas and 29,000 acres were treated with EBDC fungi-
17 cides/acre/application. In Alabama, 15,000 acres were planted and
18 2000 acres were treated with EBDC fungicides, while in Mississippi,
19 14,000 acres were planted and 4000 acres were treated. Five to
20 seven applications of EBDC fungicides were used during the crop sea-
21 son and 2.0 lb. a.i./acre/treatment. In general, chlorothalonil
22 would serve as an alternative fungicide on watermelons. Its use is
23 not widespread now because of the considerably higher cost of
24 chlorothalonil.
25
26
27

1 In 1976, 15,500 acres of cucumbers for fresh market were
2 planted in Florida and 12,800 acres were treated with EBDC fungi-
3 cides. A total of 96,300 lb. of fungicide were used during the
4 season on cucumbers. The dosage used/acre/application was 1.4 to
5 1.6 lb. a.i. and usually consisted of an average of 6.8 applications
6 during the crop season. The cost per acre of fungicide was \$18.15.
7 Chlorothalonil is the preferred alternative fungicide and would be
8 used at a cost of \$59.50 per acre. In North Carolina 8800 acres of
9 fresh cucumbers were planted and 1760 acres were treated with EBDC
10 fungicide (4 applications at a rate of 1.6 lb./acre/treatment.)
11 South Carolina planted 5900 acres and the entire acreage was treated
12 with EBDC fungicides. Growers applied an average of 4.5 appli-
13 cations per crop season at the rate of 1.4 lb. a.i./ acre/treatment.
14 In Michign 2000 acres were planted and 1200 acres were treated with
15 EBDC fungicides. Six applications were used during the crop season
16 at the rate of 1.4 lb. a.i./acre/treatment. Chlorothalonil would be
17 the preferred alternative (4 applications at a range of 1.88 lb.
18 a.i./acre/treatment).

19
20 EBDC fungicides are important in Michigan, North Carolina, and
21 South Carolina for controlling various diseases attacking processing
22 cucumbers (pickles). Gummy stem blight, downy mildew, Alternaria
23 leaf spots, and scab would be the principal diseases to be con-
24 trolled. In 1976, 27,000 acres of processing cucumbers were planted
25 in Michigan and 16,000 were treated with EBDC fungicides. Growers
26 used an average of 4.5 applications per crop at the rate of 1.2 lb.
27 a.i./acre/treatment. In North Carolina 28,000 acres were planted

1 per crop at the rate of 1.2 lb. a.i./acre/treatment. In South
2 Carolina 7900 acres were planted and 100% of this acreage was
3 treated for disease control. Growers used 4.5 applications per crop
4 at the rate of 1.4 lb. a.i./acre/treatment.

5
6 Chlorothalonil would be the preferred fungicide for control of
7 diseases in processing cucumbers and would usually consist of 4.5
8 applications per crop at the rate of 1.6 to 1.8 lb. a.i./acre/-
9 treatment. As in other crops, the chlorothalonil treatment would be
10 more expensive than the currently used EBDC fungicides.

11
12 Downy mildew of cantaloupe can cause serious losses to occur in
13 the production areas of Texas where 17,000 acres were planted in
14 1976 and 75% of this acreage was treated with EBDC fungicides.
15 Average number of applications per crop season was 4.5 to 2.0 lb.
16 a.i./acre/treatment. Both chlorothalonil and captafol would be the
17 alternatives for control of cantaloupe downy mildew. Chlorothalonil
18 would be used at 2.25 lb. a.i., while captafol would be used at 2
19 lb. a.i./acre/treatment.

20
21 Onions

22
23 Serious economic losses can occur in onion fields where protec-
24 tive fungicides have not been applied prior to conditions favorable
25 for disease development. Diseases involved include downy mildew
26
27

caused by Peronospora destructor, purple blotch caused by Alternaria porri and Botrytis leaf blight (1, 5).

In 1976, 32,000 acres of onions were planted in Texas; 24,000 acres were treated with EBDC fungicides. In New York 14,300 acres were planted of which 9,000 were treated. Growers used an average of 6 applications of EBDC fungicides per crop and 2.4 lb. a.i./acre/treatment; 7300 acres of onions were planted in Michigan and 4700 were treated with EBDC fungicides. Growers used an average of 8 applications per crop at the rate of 1.2 lb. a.i./acre/- application. In California 6400 acres were planted in 1976 and 2880 acres were treated. Growers used an average of 3.5 applications per crop at the rate of 2.4 lb. a.i./acre/application.

Alternate fungicides for onions would vary with the disease and the area of the country. For purple blotch control in California, growers would use anilazine. New York, Texas, and Michigan with Botrytis leaf spot problems would use chlorothalonil as the alternate material (4 applications; 1.13 lb. a.i./acre/treatment). Captafol has been recommended for control of powdery mildew of onions and has been used at the rate of 2 lb. a.i./acre/application, but in some tests good control has not been achieved. Benomyl is another possibility for Botrytis control, but is also on the RPAR list. Benomyl tolerant isolates of Botrytis have developed on several other crops with repeated applications.

Other Vegetable Crops

There are a number of "specialty" vegetables which have rather limited acreage. These include asparagus, collards, eggplant, endive, escarole, kale, kohlrabi, lentils, romaine, rutabaga, and Swiss chard. Despite their relatively small acreage, they are economically important to many growers involved in their production. The EBDC fungicides play a vital role in the control of diseases of these crops (Tables 1 and 16). It is important to note that at this time, the EBDC fungicides are the only effective fungicides available for the control of many of these diseases.

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TABLE 1. EBDC Fungicides and Alternative Fungicides Registered for Control Diseases of Vegetables*

Plant	Disease	Registered EBDC	Alternative** Fungicide
Asparagus	Crown rot	mancozeb	captan
	Rust	mancozeb maneb Polyram zineb	sulfur
Beans (field and snap)	Angular leaf spot	zineb	none available
	Anthracnose	maneb zineb	none available
	Downy mildew	maneb zineb	copper
Powdery mildew	maneb	sulfur	
	Rust	maneb zineb	chlorothalonil sulfur
Beans (lima)	Anthracnose	maneb zineb	none available
	Downy mildew	maneb	copper
	Rust	zineb	sulfur
Beets	Cercospora leaf spot	zineb	copper
	Downy mildew	zineb	copper
	Leaf spots	zineb	none available
	Seed treatments	zineb	thiram
Blackeyed beans	Rust	maneb	none available
Broccoli	Alternaria leaf spot	maneb	chlorothalonil
	Downy mildew	maneb zineb	chlorothalonil
	Leaf spots	zineb	chlorothalonil

*Based on a survey of extension plant pathologists coordinated by W. R. Stevenson, utilizing information contained in EPA microfiche registration files and product labels.

**Alternatives limited to those products the survey found to be presently used.

Plant	Disease	Registered EBDC	Alternative** Fungicide	
Brussels sprouts	Alternaria leaf spot	maneb	chlorothalonil	
	Downy mildew	maneb zineb	chlorothalonil	
	Leaf spots	zineb	chlorothalonil	
Cantaloupe	Alternaria leaf spot	zineb	captafol anilazine chlorothalonil	
	Angular leaf spot	zineb	copper captan	
	Anthracnose	mancozeb maneb zineb	anilazine chlorothalonil captan captafol folpet benomyl	
	Blossom blight	zineb	copper	
	Cercospora leaf spot	maneb	chlorothalonil	
	Downy mildew	mancozeb maneb Polyram zineb	anilazine chlorothalonil captafol folpet	
	Gummy stem blight	mancozeb maneb Polyram zineb	captafol chlorothalonil anilazine benomyl	
	Scab	mancozeb	captafol chlorothalonil	
	Carrot	Alternaria blight	maneb zineb	chlorothalonil
		Cercospora blight	mancozeb maneb zineb	captan chlorothalonil

Plant	Disease	Registered EBDC	Alternative** Fungicide
Cassaba melon	Alternaria leaf spot (blight)	zineb	captafol anilazine chlorothalonil
	Angular leaf spot	mancozeb	captan copper
	Anthracnose	mancozeb maneb zineb	captafol anilazine captan captafol benomyl folpet
	Blossom blight	zineb	copper
	Cercospora leaf spot	mancozeb maneb	chlorothalonil anilazine
	Downy mildew	mancozeb maneb zineb	captafol anilazine chlorothalonil folpet
	Gummy stem blight	mancozeb maneb zineb	captafol chlorothalonil anilazine benomyl
	Scab	mancozeb zineb	captafol chlorothalonil
	Cauliflower	maneb	chlorothalonil
	Downy mildew	maneb zineb	chlorothalonil
	Leaf spots	zineb	chlorothalonil
Celery	Early blight and late blight (Cercospora and Septoria)	mancozeb	chlorothalonil
		maneb	anilazine
		Polyram	copper
		zineb	benomyl
Chinese cabbage	Downy mildew	zineb	chlorothalonil
	Leaf spots	zineb	chlorothalonil

Plant	Disease	Registered EBDC	Alternative** Fungicide
Collards	Alternaria leaf spot	maneb	none available
	Downy mildew	maneb zineb	none available
	Leaf spots	zineb	none available
Corn (sweet)	Helminthosporium leaf blight	mancozeb maneb Polyram	chlorothalonil
	Alternaria leaf blight	mancozeb zineb	captafol anilazine chlorothalonil
	Angular leaf spot	zineb	copper copper
Crenshaw melons	Anthracnose	maneb zineb	folpet anilazine chlorothalonil captan captafol benomyl
	Blossom blight	zineb	copper
	Cercospora leaf spot	mancozeb maneb	chlorothalonil anilazine
	Downy mildew	mancozeb maneb zineb	anilazine chlorothalonil captafol folpet
	Gummy stem blight	mancozeb maneb zineb	captafol chlorothalonil anilazine benomyl
	Scab	mancozeb zineb	captafol chlorothalonil
Cucumber	Alternaria leaf spot	mancozeb maneb Polyram zineb	captafol chlorothalonil anilazine

	Plant	Disease	Registered EBDC	Alternative** Fungicide
1	Cucumber (Cont'd.)	Angular leaf spot	maneb	copper
2			zineb	captan
3		Anthracnose	mancozeb	captan
4			maneb	captafol
5			zineb	chlorothalonil
6				folpet
7				anilazine
8				benomyl
9		Blossom blight	zineb	copper
10		Downy mildew	mancozeb	captafol
11			maneb	chlorothalonil
12			Polyram	folpet
13			zineb	captan
14		Fruit rots		anilazine
15				copper
16			maneb	folpet
17	Eggplant	Gummy stem blight		captan
18			mancozeb	chlorothalonil
19			Polyram	folpet
20		Scab	zineb	anilazine
21				chlorothalonil
22		Anthracnose	maneb	benomyl
23			zineb	captan
24		Cercospora leaf spot	zineb	none available
25		Down mildew	zineb	none available
26		Early blight (Alternaria)	maneb	none available
27		Fruit rots	zineb	captan

Plant	Disease	Registered EBDC	Alternative** Fungicide
Honeydew melons	Alternaria blight	mancozeb	captafol
		zineb	anilazine chlorothalonil
	Angular leaf spot	zineb	copper captan
	Anthracnose	mancozeb	anilazine
		maneb	chlorothalonil
		zineb	captafol
			folpet benomyl
	Blossom blight	zineb	copper
	Cercospora leaf spot	mancozeb	chlorothalonil
		maneb	anilazine
	Downy mildew	mancozeb	anilazine
		maneb	chlorothalonil
		zineb	captafol
			folpet
Kale	Gummy stem blight	mancozeb	captafol
		maneb	chlorothalonil
		zineb	anilazine
			benomyl
	Scab	mancozeb	captafol
		zineb	chlorothalonil
	Alternaria	maneb	none available
	Downy mildew	maneb zineb	none available
	Leaf spots	zineb	none available
Lettuce	Botrytis blight and rot	zineb	copper
	Downy mildew	maneb zineb	copper

	Plant	Disease	Registered EBDC	Alternative** Fungicide
1	Persian melon	Alternaria blight	mancozeb zineb	captafol anilazine chlorothalonil
2				
3				
4		Angular leaf spot	zineb	copper captan
5				
6		Anthracnose	mancozeb maneb zineb	anilazine chlorothalonil captan captafol folpet benomyl
7				
8				
9				
10				
11		Blossom blight	zineb	none available
12		Cercospora leaf spot	mancozeb maneb	chlorothalonil anilazine
13				
14		Downy mildew	mancozeb maneb zineb	anilazine chlorothalonil captafol folpet
15				
16				
17				
18		Gummy stem blight	mancozeb maneb zineb	captafol chlorothalonil anilazine benomyl
19				
20		Leaf spots	mancozeb maneb	anilazine
21		Scab	mancozeb zineb	captafol chlorothalonil
22	Mushroom	Brown spot (Verticillium)	zineb	benomyl
23		Cobweb (Dactylium)	zineb	none available
24		Mildew	zineb	none available
25		Soft rot	zineb	none available
26	Lettuce	Botrytis blight and rot	zineb	copper
27		Downy mildew	maneb zineb	copper

Plant	Disease	Registered EBDC	Alternative** Fungicide
Muskmelon	Alternaria blight	mancozeb	captafol
		zineb	anilazine
			chlorothalonil
	Angular leaf spot	zineb	captan
			copper
	Anthracnose	mancozeb	anilazine
		maneb	chlorothalonil
		zineb	captan
			captafol
			benomyl
			folpet
	Blossom blight	zineb	copper
	Cercospora leaf spot	mancozeb	chlorothalonil
		maneb	anilazine
	Downy mildew	mancozeb	anilazine
		maneb	chlorothalonil
		zineb	captafol
			folpet
	Gummy stem blight	mancozeb	captafol
		maneb	chlorothalonil
		zineb	anilazine
			benomyl
	Scab	mancozeb	captafol
		zineb	chlorothalonil
Onion	Botrytis blight and neck rot	mancozeb	anilazine
		maneb	chlorothalonil
		zineb	captafol
	Down mildew	mancozeb	captafol
		maneb	folpet
	Neck rot	mancozeb	none available
	Purple blotch	mancozeb	anilazine
		maneb	captafol
		zineb	folpet
	Smut	mancozeb	thiram

Plant	Disease	Registered EBDC	Alternative** Fungicide
Peas	Damping off	zineb	captan
	Downy mildew	zineb	none available
	Rust	zineb	none available
Potato	Early blight	mancozeb	anilazine
		maneb	captafol
		Polyram	chlorothalonil
	Late blight	mancozeb	anilazine
		maneb	captafol
		Polyram	chlorothalonil copper
	Scab	mancozeb Polyram	none available
	Seed piece treatment	mancozeb zineb Polyram	captan
Pumpkin	Alternaria blight	zineb	chlorothalonil anilazine
	Angular leaf spot	maneb zineb	captan copper
	Anthracnose	zineb	captan chlorothalonil folpet
	Downy mildew	maneb zineb	chlorothalonil folpet anilazine
Radish	Gummy stem blight	zineb	chlorothalonil anilazine
	Scab	zineb	chlorothalonil
	Alternaria leaf spot	zineb	none available
	Downy mildew	zineb	none available
	Leaf spots	zineb	none available

	Plant	Disease	Registered EBDC	Alternative** Fungicide
1	Spinach	Anthracnose	maneb	none available
2			zineb	
3		Cercospora leaf spot	maneb	none available
4			zineb	
5		Downy mildew	maneb	captan
6			zineb	
7		White rust	maneb	captan
8				
9	Squash	Alternaria leaf spot	mancozeb	anilazine chlorothalonil
10			zineb	
11		Angular leaf spot	zineb	copper captan
12				
13		Anthracnose	mancozeb	anilazine chlorothalonil captan folpet
14			maneb zineb	
15		Cercospora leaf spot	mancozeb	anilazine chlorothalonil
16				
17		Downy mildew	mancozeb	folpet anilazine chlorothalonil
18			maneb zineb	
19		Gummy stem blight	mancozeb	chlorothalonil anilazine
20			zineb	
21		Pythium fruit rot	maneb	none available
22				
23	Tomato	Anthracnose	mancozeb	chlorothalonil captan folpet captafol anilazine
24			Polyram	
25			zineb	
26				
27		Bacterial spot	mancozeb	copper
			maneb	
		Black mold (Alternaria)	mancozeb	chlorothalonil captafol

Plant	Disease	Registered EBDC	Alternative** Fungicide
Tomato (Cont'd.)	Early blight	mancozeb	chlorothalonil
		maneb	captafol
		Polyram	anilazine
		zineb	copper
	Gray leaf spot (Stemphylium)	maneb	anilazine
		Polyram	chlorothalonil
			captan
			captafol
	Gray leaf mold	mancozeb	chlorothalonil
		zineb	benomyl
	Late blight	mancozeb	chlorothalonil
		maneb	captafol
		Polyram	anilazine
		zineb	
	Nailhead spot	zineb	captafol
	Septoria leaf spot	maneb	captan
		zineb	anilazine
	Southern blight	zineb	none available
Turnip	Downy mildew	maneb	none available
		zineb	
	Leaf spots	maneb	none available
		zineb	
Watermelon	Alternaria leaf spot	mancozeb	anilazine
		maneb	chlorothalonil
	Angular leaf spot	zineb	copper
			captan
	Anthracnose	mancozeb	ahlorothalonil
		maneb	anilazine
		zineb	captafol
			captan
			folpet
	Blossom blight	zineb	copper

Plant	Disease	Registered EBDC	Alternative** Fungicide
Watermelon (Cont'd.)	Downy mildew	mancozeb	chlorothalonil
		maneb	captafol
		zineb	folpet
	Gummy stem blight	mancozeb	anilazine
		maneb	captafol
		zineb	chlorothalonil
	Leaf spots	mancozeb	anilazine
		maneb	chlorothalonil
	Scab	mancozeb	chlorothalonil
		zineb	

TABLE 2. EBDC Fungicides and Registered Alternatives on Sweet Corn

Fungicide	No. of Applications	Rate	Program Cost per Acre Dollars
Maneb, Maneb + Zinc	11.1	1.5 lbs	25.39
Mancozeb	11.1	1.5 lbs	25.39
Zineb	11.1	2.0 lbs	31.75
Metiram	11.1	3.0 lbs	46.62
Capafol	11.1	1.5 qts	50.99
Chlorothalonil	11.1	1.5 pts	58.28

TABLE 3. EBDC Fungicides and Registered Alternatives on Celery

Fungicide	No. of Applications	Rate	Program Cost per Acre Dollars
Maneb, Maneb + Zinc	20.2	1.5 lbs	46.21
Mancozeb	20.2	1.5 lbs	46.21
Zineb	20.2	2.0 lbs	57.77
Metiram	20.2	2.0 lbs	56.56
Benomyl	20.2	0.5 lbs	90.90
Chlorothalonil	20.2	1.5 pts	106.05
Copper	20.2	2.0 lbs	79.70
Anilazine	20.2	4.0 lbs	242.40
Thiram	20.2	2.0 lbs	54.54
Dichlone	20.2	1.0 lbs	95.95

TABLE 4. EBDC Fungicides and Registered Alternatives on Peppers

Fungicide	No. of Applications	Rate	Program Cost per Acre Dollars
Maneb Maneb + Zinc	7.6	1.5 lbs	17.39
Zineb	7.6	2.0 lbs	21.74
Copper	7.6	4.0 lbs	53.20

TABLE 5. EBDC Fungicides and Registered Alternatives on Cabbage

Fungicide	No. of Applications	Rate	Program Cost per Acre Dollars
Maneb Maneb + Zinc	4.9	1.5 lbs	11.21
Zineb	4.9	2.0 lbs	14.01
Chlorothalonil	4.9	1.5 pts	25.73

TABLE 6. Fresh Market Tomatoes, Acres Planted, Acres Treated

Selected States	Acres Planted	Acres Treated	Percent
New Jersey	6,900	3,000	43
Maryland	2,400	1,000	42
Virginia	2,500	1,000	40
South Carolina	8,000	8,000	100
Georgia	3,100	3,100	100
Michigan	4,400	4,400	100
Alabama	8,500	7,500	88
New York	3,200	1,000	31
North Carolina	2,100	2,100	100
Florida	39,300	37,795	96
California	29,400	3,140	11
Total Selected States	109,800	72,035	

1. Marketing Florida Sub-Tropical Fruits and Vegetables. Summary 1975-76, Federal-State Market News Service, P. O. Box 19246, Orlando, Florida 32814, June 1, 1976.
2. Vegetables-Fresh Market, 1976 Annual Summary, Acreage, Yield, Production and Value Crop Reporting Board, Vg. 2-2 (77) Statistical Reporting Service, USDA, Washington, D. C. 20250.

TABLE 7. Fresh Market Tomatoes, Number of Spray Applications, Rate per Acre per Application, Active Ingredient per Acre per Application, and Quantity of EBDC Used.

Selected States	Number of Applications	Formulation/Acre per Application	Active Ingredient/Acre/Application	Estimated Total Quantity Used
New Jersey	6	2.5	2.0	36,000
Maryland	6	3	2.4	14,400
Virginia	6	3	2.4	14,400
South Carolina	8	1.75	1.4	85,120
Georgia	4	2	1.6	18,560
Michigan	8	2	1.6	55,040
Alabama	7	2.5	2.0	105,000
New York	5	3	2.4	12,000
North Carolina	10	1.5	1.2	24,000
Florida	21.6	1.85	1.5	1,216,800
California	4	2.5	2.0	25,120
Total Selected States				1,606,440

TABLE 8. Fresh Market Tomatoes, Average Yield per Acre, Yield with No EBDC and Percent Loss with No EBDC.

Selected States	Ave. Yield/Acre 74-76	Estimated Yield No Treatment	Estimated % Loss in Yield no Treatment
	CWT	CWT	
New Jersey	86	60 - 69	20 - 30
Maryland	99	69 - 79	20 - 30
Virginia	127	89 - 102	20 - 30
South Carolina	87	61 - 70	20 - 30
Georgia	69	48 - 55	20 - 30
Michigan	92	64 - 74	20 - 30
Alabama	66	46 - 53	20 - 30
New York	122	85 - 98	20 - 30
North Carolina	148	104 - 118	20 - 30
Florida	236	0 - 118	50 - 100
California	230	184 - 207	10 - 20

1. In each of the above states, Bravo appears to be the preferred alternative. This material would be applied at a rate of 2.0 lb. per acre at the same frequency and total number of applications as EBDC.

TABLE 9. EBDC Fungicides and Registered Alternatives on Tomatoes

Fungicide	Number of Applications	Rate Formulation	In Dollars Program Cost per Acre
Maneb, maneb + zinc	21.6	1.85 lbs	60.94
Mancozeb	21.6	1.85 lbs	60.94
Zineb	21.6	3.00 lbs	92.66
Metiram	21.6	2.00 lbs	60.48
Benomyl	21.6	0.50 lb	97.20
Captan	21.6	6.00 lbs	160.70
Captafol	21.6	2 qts	132.30
Chlorothalonil	21.6	3 qts	226.80
Copper ¹	21.6	2.00 lbs	75.60
Anilazine	21.6	3.00 lbs	194.40
Ziram	21.6	3.00 lbs	
Dichlone	21.6	1.00 lb	102.60

¹Copper hydroxide (basic, and resins 50%) is not used exclusively throughout crop season since it is not as effective as major alternatives and is toxic to the plant.

TABLE 10. Acreage of the Major Areas (States) Growing Tomatoes
for Processing in the United States in 1976.

State	Acres Planted
California	267,7000
Indiana	14,300
Maryland	4,400
Michigan	4,100
New Jersey	9,400
Ohio	22,600
Pennsylvania	6,500

TABLE 11. Acres of Processing Tomatoes Treated with EBDC Fungicides in 1976

State	Acres Treated	Percent of Total Acres Planted Which Were Treated
California	23,686	9
Indiana	12,000	84
Maryland	2,200	50
Michigan	3,000	73
New Jersey	6,000	64
Ohio	22,300	99
Pennsylvania	4,500	69

TABLE 12. Registered Alternative Compounds Recommended for Control of Tomato Diseases in Various States.

Disease	EBDC's Recommended	Alternatives Recommended
Early	Yes	Chlorothalonil captafol anilazine dichlone captan folpet ziram ferbam
Anthracnose	Yes	chlorothalonil captafol anilazine copper folpet captan benomyl ziram ferbam
Late Blight	Yes	chlorothalonil captafol anilazine copper captan folpet
Septoria	Yes	chlorothalonil anilazine copper captafol folpet captan benomyl
Grey Leaf Spot	Yes	chlorothalonil anilazine captafol benomyl captan folpet copper
Botrytis Mold	Yes	benomyl chlorothalonil anilazine dichloran copper captan thiram ferbam

TABLE 13. Estimated Pounds of EBDC Fungicides Used in Seven States on Processing Tomatoes in 1976.

State	Average Number Applications/Season	Lb. (AI)/Acre/ Application	Total lb. Applied/Season
California	2	2.0	94,744
Indiana	8	2.0	192,000
Maryland	8	2.0	35,200
Michigan	8	2.0	48,000
New Jersey	8	2.0	96,000
Ohio	8	2.0	356,800
Pennsylvania	8	2.0	72,000

TABLE 14. The Effect of Fungicidal Sprays on Yield and Disease Control of Processing Tomatoes Over a Twelve-Year Period (1964-1976) at the University of Maryland Vegetable Farm, Salisbury, Maryland.

Treatment	Rate/Acre (ai)	Yield (Tons/Acre)	Disease Control	
			Percent Anthracnose	Percent Defoliation from Early Blight
Control (Unsprayed)	—	13.9	27.5	81
Maneb	2.4 lb	20.5	8.1	35
Captafol	2.0 lb	23.5	4.9	27
Chlorothalonil	1.9 lb	24.3	5.2	29

¹/Eight application applied on a 7-day schedule.

²/Mean of 10 experiments (1964, 1965, 1967-1973, 1976).

TABLE 15. Comparison of Results for Control of Lima Bean Downy Mildew at the University of Maryland Vegetable Farm, Salisbury, Maryland.

Material	Concentration	Percent Infected Pods		Pounds Shelled Beans/Acre	
		Test #1	Test #2	Test #1	Test #2
Untreated	—	38.0	34.0	2523	1842
Maneb	2 lb/100 gal	0.4	1.0	3819	3991
Tribasic Copper	4 lb/100 gal	9.0	2.0	3248	3435
Streptomycin	100 ppm	25.0	14.0	2438	2282

TABLE 16. Some Diseases of Vegetables Controlled by EBDC Fungicides
for Which No Registered Alternative Fungicide Exists.

Crop	Disease
Beans	Anthracnose
Collards	Downy mildew Alternaria Cercospora White spot White rust
Eggplant	Leaf blights Cercospora Downy mildew
Endive	Alternaria Downy mildew White rust Grey mold
Escarole	Downy mildew Alternaria
Kohlrabi	Alternaria Downy mildew
Lentils	Leaf & Stem spots Blights
Peas	Downy mildew Rust
Radish	Alternaria leaf spot Downy mildew Leaf spots
Romaine	Downy mildew
Rutabaga	Downy mildew
Spinach	Anthracnose Cercospora leaf spot
Swiss Chard	Downy mildew
Turnip	Downy mildew Leaf spots

POTATOES

Potatoes are grown in every state within the continental United States, including Alaska. It is estimated that about 353,386,000 cwt of potatoes were produced on approximately 1,374,100 acres in 1976. In 1976, 32% (439,712 acres) of the potatoe acreage was east of the Mississippi River and 68% west of it. Approximately 58% of the acreage was located in the top five potato producing states: Idaho, Maine, Minnesota, North Dakota, and Washington (USDA SRS CRB Crop Production 1976 Annual Summary Jan. 17, 1977).

Fungicide Uses

Fungicidal sprays are used to control two major foliar diseases of potatoes; namely late blight caused by Phytophthora infestans (Mont) de Bary and early blight caused by Alternaria solani (Ell. & G. Martin). L. R. Jones & Grout. Fungicidal sprays also are suggested for the control of Botrytis leaf spot and vine rot caused by Botrytis sp. in some states. Fungicidal dusts are applied to the seedpieces before planting for the control of Fusarium seedpiece decay caused by several species of Fusaria, Rhizoctonia stem canker caused by Rhizoctonia solani kuhn, common scab caused by Streptomyces acabies (Thaxt.) Waks. & Henrici., Verticillium wilt caused by Verticillium albo-atrum Reinke & Berth. and other pathogens that may be carried on the seed tubers. None of these uses involve application directly to the plant part that is harvested and eaten (the tubers).

Foliar sprays are used primarily for the control of late blight in the Eastern Region of the United States. Most fungicides that are recommended for the control of late blight will also control early blight (Harrison & Venette 1970). Since late blight, in areas where it occurs, can and usually does cause more damage to the potato crop than early blight, more work has been done on the development of fungicides for the control of late blight than for early blight.

Late Blight

Late blight was the cause of the 1845-46 potato famine in Ireland and has been reported as occurring in most, if not all, major potato production areas of the world as well as the United States (Cox and Large 1960). Approximately 47% of the potato acreage in the United States is exposed to late blight to one degree or another. It occurs mainly in those areas with high rainfall and/or high relative humidity (90% or more) for ten or more consecutive hours on one or more days per week during the growing season. Consequently, it is a constant threat to the potato industry along the Atlantic coast; valley areas of most mountainous regions; along lakes, rivers, and streams; in muck soil areas of the Northeast and Midwest, and in coastal and localized irrigated areas of the Pacific Northwest.

Yield losses due to late blight depend upon when the epidemic begins in relation to plant and tuber development and how rapidly

1 epidemic develops (James et al 1972, Mackenzie and Petruzzo 1975,
2 and Latin et al 1978), and both are dependent upon moisture and
3 temperature in the macro- and micro-environment. Under optimum
4 conditions the late blight fungus can complete its life cycle in 4-5
5 days (Crosier 1934, Cox and Large 1960). Under most field condi-
6 tions, however, the time required for completion of the cycle from
7 inoculation to lesion formation and spore production is 5 to 10
8 days. Since spore production and disease development is geometric,
9 the initial phases in the development of a late blight epidemic are
10 relatively slow and may go undetected. Once the inoculum potential
11 in a field or area reaches a given point, the development of the
12 epidemic is rapid, devastating and uncontrollable, even with broad
13 usage of the maximum label rate of the effective protective fungic-
14 cides commercially available. Consequently, to obtain maximum
15 control of late blight, growers must apply a protective fungicide
16 before an epidemic begins and continue to apply it on a 7- to 10-day
17 schedule during the remainder of the growing season. This is espe-
18 cially true in the Gulf, New England, and Great Lake States where
19 late blight is most likely to occur, because the potato plant pro-
20 duces new unprotected foliage throughout most of the growing season,
21 residue on the foliage decreases as a result of weathering and
22 degradation of the fungicide deposit, and weather forecasters cannot
23 accurately predict several days in advance when environmental
24 conditions will be favorable for the disease.

25 In the late 1800's and early 1900's when potato farmers either
26 did not apply a fungicidal spray or dust, or did apply them with
27

1 equipment that was not adequate for the job, late blight occurred
2 almost every year in several states along the Atlantic Coast (USDA
3 1917 - Plant Dis. Bull. No. 6 Nov. 1, 1917, USDA 1922 - Plant
4 Dis. Bull. 24:489-510). Even today with the widespread use of
5 modern application equipment and more effective fungicides, late
6 blight usually occurs in one or more states along the Atlantic Coast
7 each year. The widespread use of effective protective fungicides,
8 such as the EBDC's, captafol and chlorothalonil, keeps the losses to
9 a minimum, probably less than 5% for the potato industry as a whole
10 in the affected regions. The potential losses, however, if no
11 effective fungicide was available or permitted to be used, could be
12 in the range of 30 to 40% for affected areas and as high as 100% for
13 individual growers (Table 1) (James et al 1972, Latin et al 1978,
14 MacKenzie and Petruzzo 1975, and Plank 1963). Most modern day late
15 blight epidemics occur as a result of growers' inability to apply
16 the protective fungicidal sprays during extended periods of wet
17 weather, which is favorable for late blight development. The losses
18 due to late blight are (1) a reduction in yield due to premature
19 death of the plants, (2) tuber rot that develops in the field before
20 harvest, (3) tuber rot that develops in storage after harvest,
21 (4) increased labor costs to sort infected lots to U. S. No. 1 grade
22 standards, (5) reduced price received for shipments rejected at
23 points of destination, and (6) regrading and repacking costs at the
24 wholesale and retail levels. Most of these losses are prevented by
25 application of effective protective fungicidal sprays during the
26 growing season.
27

Early Blight

Early blight occurs in every major U. S. potato producing region. Nearly 100% of potato acreage in the United States is exposed to early blight. The importance of this disease, however, varies with the cultivar grown and the environment during any given growing season. The early blight fungus is not restricted by the same conditions of high humidity and moderate temperatures as the late blight pathogen. Although high rates of water application under sprinkler irrigation favor secondary spread of this fungus, it is adapted to relatively arid conditions and high daytime temperatures. It is for this reason that, even though late blight is the more serious threat, early blight is more widespread in North America.

Approximately 53% of U. S. potato acreage is not exposed to late blight and in these regions, early blight is the major disease problem for which foliar fungicides are used. Early blight is effectively controlled by successive applications of the same fungicides used to control late blight. From two to four applications per season are normally sufficient. The disease typically affects maturing plants which have already produced a considerable portion of their yield. Losses, even without control, are therefore somewhat less than is generally true of uncontrolled late blight. The Russet Burbank is the predominant cultivar grown in areas in which early blight is the major foliar disease problem. This is a relatively resistant variety which helps make early blight a less

1 serious threat to U. S. potato production. Even so, yield increases
2 of up to 22% have been obtained with fungicidal control of early
3 blight on the Russet Burbank cultivar in perennial problem areas
4 (Douglas and Garner 1974). Because of the large acreage affected,
5 even marginal disease problems (less than 10% yield loss) in most
6 years would amount to a very great actual production loss. If early
7 varieties or more susceptible late varieties were to be grown, the
8 early blight problem would be magnified.
9

10 The early blight fungus can also infect the tuber at harvest
11 and cause considerable loss in storage--both as direct rot loss and
12 even more important, loss of quality in the tubers removed from
13 storage. Infected tubers have low quality from several standpoints.
14 Lower grade and higher trim loss are the most obvious. Less obvious
15 are the levels of metabolites produced as a result of infection,
16 which pose an as yet undefined health hazard to the consumer.
17 Fungicidal control of foliar blight development reduces the inoculum
18 potential for the tuber at harvest and may decrease the amount of
19 tuber rot that develops in storage.
20

21 Seedpiece Treatment 22

23 The primary target for seedpiece treatment is *Fusarium* seed-
24 piece decay. Since the fungus can be found in most, if not all,
25 potato soils and on the surface of most, if not all, tubers
26 (Cunningham and Reinking 1946), 100% of the potato acreage is
27

1 exposed to this malady. Seedpiece decay can reduce yields by
2 reducing plant vigor and stands.

3
4 Before seedpiece treatment became a common practice in the late
5 1940's, stand reductions of 10 to 90%, due to Fusarium seedpiece
6 decay, were common (Cunningham and Reinking 1946). When stands were
7 seriously reduced, growers either replanted the affected fields to
8 potatoes or to some other crop. Replanting of potatoes was costly
9 and usually resulted in reduced yields as a result of the late
10 planting date. The early seedpiece treatments involved dipping the
11 whole tubers in suspensions of Semesan Bel (a mercurial compound) or
12 solutions of nabam (Cunningham and Reinking 1946). These treat-
13 ments reduced the population of the seedpiece rotting organisms on
14 the surface of the whole tubers but did not protect the cut surfaces
15 from contamination and invasion by the Fusaria fungi and other seed-
16 piece decaying organisms (Cetas 1966b F & N Tests - 1965). Con-
17 sequently, stand reduction due to Fusarium decay often was a problem
18 even though the whole tubers had been dipped in either a mercurial
19 suspension or nabam solution. In 1953 Rulhe demonstrated that
20 captan dust would reduce the losses due to seedpiece decay (APS -
21 Agric. Chem. 9(2):5862,125-129). Manzer and Merriam (Table 8)
22 (Manzer and Merriam 1967 - F & N Tests 22:114-115) found that the 7%
23 metiram dust provided better control of scab than the 10% captan
24 dust. Tests conducted in 1967 and 1968 demonstrated that mancozeb
25 dusts would control Fusarium seedpiece decay, Rhizoctonia stem
26 canker and scab (Cetas 1968 - F & N Tests 23:120, Cetas 1969 - F & N
27 Tests 24:111 and Manzer and Merriam 1969 - F & N Tests 24:112-113).

1 The 8% mancozeb dust became commercially available in the late
2 1960's and is currently used by more growers than either 7.5% or 10%
3 captan or 7% metiram dust for the control of Fusarium seedpiece
4 decay, Rhizoctonia stem canker and/or scab in the United States.

5
6 Fungicides are always recommended for potatoes as part of the
7 crop management program. Along with pesticide application, this
8 includes use of disease-free seed stock, complete healing of cut
9 seed, removal of diseased material, crop rotation, the use of
10 cultural practices which favor the potato and suppress pests, and
11 the use of resistant varieties where feasible. The major EBDC
12 alternatives for foliar use (captafol and cholorthalonil) can give
13 equivalent control of early blight and late blight at somewhat
14 higher costs. Captan, the only viable alternative as seed-piece
15 treatment, does not give comparable control of all pathogens
16 associated with the seedpiece. Due to the large quantities of EBDC
17 used (approximately 60% of all early blight treatment, 65% of all
18 late blight treatment, and 65% of all seedpiece treatment in the
19 United States), alternatives would have to be manufactured in large
20 enough quantity to supply all of the immediate demands should EBDC
21 registration be dropped. The registration of two of the three major
22 alternatives, captan and the captan derivation captafol, is being
23 questioned in pre-RPAR reviews, limiting alternatives even further.
24 A potential problem of unknown impact would be the possibility of
25 the loss of effectiveness of these alternatives due to fungal
26 resistance. The copper fungicides, which were phytotoxic and of
27 lower efficacy, and the EBDC's have historically been the major

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2 treatments for early and late blight. No fungal resistance to these
3 materials has developed because of the multiple sites of inhibition
4 apparently involved.
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SUMMARY OF EFFICACY DATA FOR EBDC's AND VIABLE ALTERNATIVES

Late Blight

In all tests conducted from 1972-1976, EBDC's reduced the rate at which late blight epidemics developed. When the epidemics were initiated early enough, their use reduced the yield losses due to late blight. In many tests, the EBDC's did not control the foliar blights as well as captafol or chlorothalonil, but were more efficacious than the copper fungicides included in a few tests (Tables 2, 3, and 4) (Baldwin 1973a; Callbeck 1973, 1974, 1975, 1977; Cetas 1973a, 1974a, 1975a, 1976a, 1977a, 1978; Krause et al 1974, 1975; Manzer and Merriam 1973, 1974, 1975; Manzer et al 1976a, 1977a; Rowe 1977a; Wade and Wies 1974a; Weingartner 1973a, 1973b).

Early Blight

The information on benefits of early blight control falls into two categories:

1. Total yield benefits with treatment: Average maximum losses of 18% with no treatment for all trials reviewed.
2. Benefits in increases in quality of potatoes: Average maximum losses of 26% in U. S. No. 1's with no treatment for all trials reviewed.

1 It is generally believed that control of foliar blight provides some
2 protection to the tubers at harvest by lowering the inoculum poten-
3 tial. Since there is no documentation available for the prevention
4 of loss of quality in stored potatoes through foliar treatment, the
5 benefits in maintenance of storage quality through foliar fungicide
6 applications cannot be assessed at this time. Chlorothalonil and
7 captafol appear to give equal or slightly better control (Table 5)
8 (Douglas and Groskopp 1974; Douglas and Garner 1974; Harrison et al
9 1965a, b,c; Harrison and Venetta 1970; Hugelot 1976; Manzer et al
10 1976b, 1977b).

11 Seedpiece Decay and Other Seedpiece Related Diseases

13 The results of the seedpiece treatment tests reviewed for this
14 report demonstrate the ability of the captan, mancozeb, and metiram
15 dusts to control three diseases of potatoes caused by seedpiece-
16 borne pathogens: Fusarium seedpiece decay, Rhizoctonia stem canker
17 and scab. Under high inoculum pressures, the mancozeb dust often
18 provided better control of Fusarium seedpiece decay than either
19 captan or metiram dust (Table 6) (Baldwin 1973b, 1974, 1975, 1976;
20 Cetas 1973b, 1974b, 1975b, 1976b, 1977b; Weingartner 1974). Captan
21 dusts, however, often were equal to or better than the EBDC dusts
22 for the control of Rhizoctonia stem canker (Table 7) (Abdel-Rahman
23 1975, Cetas 1973c, 1974c, 1975c, 1976c, 1977c; Rowe 1977b). Tests
24 conducted in Maine indicate that the EBDC dusts are more effective
25 than captan dusts for the control of scab (Table 8) (Manzer and
26 Merriam 1965, 1966, 1967, 1968, 1969; Manzer, Merriam and Alexander
27

1 1970, 1971, 1972); but on Long Island, New York, captan usually
2 controlled scab as well as the EBDC's (Table 9) (Cetas 1973d, 1974d,
3 1975d, 1976d, 1977d). The dust treatments often improved the vigor
4 and stand of plants and yield of tubers as a result of controlling
5 seedpiece decay and/or Rhizoctonia stem canker. When applied to
6 scabby seedpieces, the treatments usually decreased the incidence of
7 scabby tubers at harvest and occasionally decreased the severity of
8 scab on the affected tubers. In addition to controlling Fusarium
9 seedpiece decay, Rhizoctonia stem canker and scab, the results of
10 some tests reviewed for this report indicate that the captan and
11 EBDC dust treatments may reduce the losses due to blackleg, Ver-
12 ticillium wilt and other diseases caused by pathogens carried on the
13 seedpieces (Table 7) (Abdel-Rahman 1975, Line and Eide 1961,
14 Stanghellini 1972, Weingartner 1974).

15 Alternatives for EBDC's

16
17 The only viable alternatives for the EBDC fungicides are captafol
18 and chlorothalonil. The results of the various tests summarized in
19 Tables 2 through 5 indicate that captafol and chlorothalonil will
20 control late and early blight as well as or slightly better than any
21 of the EBDC fungicides. Their use, however, did not result in
22 yields that were significantly greater than those obtained from the
23 use of the EBDC fungicides. In general, the use of captafol or
24 chlorothalonil resulted in less late blight tuber rot. The results
25 of some tests (Table 4) indicate that the foliar residues of capta-
26 fol and of chlorothalonil will provide better protection against
27

1 late blight over a longer period of time than the residues of the
2 EBDC fungicides, especially during periods of rainy wet weather when
3 ground applications are impossible.
4

5 The per acre cost of controlling late blight of potatoes in
6 1976 was about \$18.00 with an EBDC fungicide, \$23.00 with captafol,
7 and \$32.00 with chlorothalonil. The removal of the EBDC's from the
8 market would result in an increase in the cost of producing potatoes
9 and in either an increase in the price of potatoes to the consumer
10 or a decrease in net income for the potato farmer or both. The only
11 viable alternative to the EBDC fungicidal dusts for treating seed-
12 pieces for control of the various seedpiece-borne diseases is
13 captan. As indicated earlier, captan dust is not as effective as
14 mancozeb or metiram dust for the control of Fusarium seedpiece
15 decay, especially when the inoculum potential is high. Captan,
16 however, often is equal or superior to the EBDC fungicides for the
17 control of Rhizoctonia stem canker. Captan was equal to mancozeb
18 and metiram for the control of scab on Long Island, New York, but
19 failed to control scab satisfactorily in Maine. Since the cost of
20 captan dust is about the same as for mancozeb and metiram dust, the
21 loss of the EBDC fungicidal dusts for treating potato seedpieces
22 probably would have little or no effect on the cost of potato pro-
23 duction. Their loss, however, would reduce the arsenal of fungi-
24 cides that growers have available for controlling, at least in part,
25 diseases that are caused by the complex of pathogens that are car-
26 ried on seed tubers.
27

TABLE 1. Potential Yield Losses Due to Late Blight^{1/}

State	Year	Cultivar	% Defoliation		cwt per Acre		Loss	
			Treated ^{2/}	Check ^{3/}	Treated ^{2/}	Check ^{3/}	cwt/A	%
Wisconsin	1972	Russet Burbank	7	48	203	180	23	11.3
Wisconsin	1973	Russet Burbank	22	92	344	299	45	13.1
Maine	1973	Katahdin	3	71	290	243	47	16.2
Maine	1972	Katahdin	16	100	388	314	74	21.9
Maine	1972	Katahdin	5	100	392	293	99	25.3
Maine	1973	Katahdin	1	84	271	199	72	26.6
Pennsylvania	1975	?	54	100	342	248	94	27.5
Florida	1972	Red La Soda	2	100	241	172	69	28.6
Maine	1974	Katahdin	7	87	313	209	104	33.2
Maine	1976	Katahdin	2	83	337	218	119	35.3
New York	1975	Hudson	5-10	80-100	321	203	118	36.8
Pennsylvania	1974	Kennebec	43	95	207	207	137	39.8
New York	1975	Katahdin	1-5	80-100	226	130	96	42.5
Maine	1974	Katahdin	3	98	339	179	160	47.2
Pennsylvania	1974	Kennebec	62	99	329	152	177	53.8
New York	1976	Hudson	13	100	334	158	176	52.7
Michigan	1973	Russet Burbank	23	71	148	37	111	75.0

^{1/}Data for this table taken from annual reports of fungicide trials published in Fungicide and Manicicide Tests, Volumes 28, 29, 30, 31, and 32, published by the Amer. Phytopathological Society in 1973, 1974, 1975, 1976, and 1977, respectively.

^{2/}Plots sprayed with either an EBDC, captafol or chlorothalonil fungicide.

^{3/}Plots not sprayed with a fungicide. Otherwise treated the same as those sprayed with a fungicide.

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Table 2. Results of spraying potatoes with various fungicides for the control of early and late blights in Wisconsin in 1973^{1/}.

Fungicide and formulation ^{3/}	Lb ai/A	% infection		Cwt/A
		Early	Early and	
		blight 30 Aug.	late blight 20 Sept	
Check (no fungicide)		22.8 a	92 a	299 b
Captafol 4F	1.0-1.5 ^{2/}	5.1 c	22 b	344 a
Chlorothalonil 6F	0.75	6.1 c	24 b	343 a
Mancozeb 80W	1.20	10.1 bc	37 b	342 a
Metiram 80W	1.20	10.0 bc	39 b	325 a
Fentin hydroxide 47.5W	0.119-0.178 ^{2/}	5.8 c	37 b	356 a

^{1/} Test conducted on the 'Russet Burbank' cultivar. Small letters indicate Duncan's multiple range groupings of means that do not differ significantly at the 5% level. Wade, E. K. and G. G. Weis. 1974.

^{2/} Lower dosage applied first four sprays, higher dosage applied during remainder of season.

^{3/} Fungicides applied weekly beginning 29 June and ending 14 Sept. with a high-pressure sprayer calibrated to apply 30 gal/A at 200 psi. Plots inoculated with Phytophthora infestans 30 July and 10 Aug and harvested 10 Oct.

Table 3. Results of foliar fungicide trials at Aroostook Farm, Presque Isle,
Maine for the control of late blight of potatoes, 1972-1976^{1/}.

Fungicide and formulation ^{2/}	Lb ai/A ^{2/}	% defoliation	Cwt/A	% tuber rot
<u>1972^{3/}</u>				
Check (no fungicide)		100.0	--- ^{8/}	---
Captafol 4F	0.8-1.6	2.6	414	1.4
Chlorothalonil 6F	0.375-0.75	7.0	420	5.0
Chlorothalonil 75W	0.375-0.75	5.6	381	3.8
Maneb 80W	0.8-1.6	16.0	400	6.7
Mancozeb 80W	0.8-1.6	18.0	409	8.4
Metiram 80W	1.2-2.4	15.8	436	3.5
<u>1973^{4/}</u>				
Check (no fungicide)		71.0	270	2.8
Chlorothalonil 6F	0.75-1.12	0.2	310	0.0
Maneb 80W	0.8	1.0	328	4.6
Mancozeb 80W	0.8-1.6	1.0	324	1.6
Metiram 80W	1.2	2.8	331	4.4
<u>1974^{5/}</u>				
Check (no fungicide)		100.0	---	---
Captafol 4F	0.8-1.6	13.6	349	0.8
Chlorothalonil 6F	0.75	0.0	368	2.6
Mancozeb 80W	0.8-1.6	0.2	374	5.8
Metiram 80W	1.2	6.8	365	7.0

Table 3. Concluded.

Fungicide and formulation ^{9/}	Lb ai/A ^{2/}	% defoliation	Cwt/A	% tuber rot
<u>1975^{6/}</u>				
Check (no fungicide)		80.0	---	---
Captafol 4F	0.8	0.0	353	---
Chlorothalonil 6F	0.56	0.0	362	---
Mancozeb 80W	0.8	0.0	351	---
Metiram 80W	1.2	0.0	365	---
<u>1976^{7/}</u>				
Check (no fungicide)		100.0		
Chlorothalonil 6F	0.75	2.0	365	---
Mancozeb 80W	0.8-1.6	2.0	350	---

1/ All tests conducted using the 'Katahdin' cultivar. Defoliation data for 'check' taken from buffer rows except in 1973 when 'check' was included in test.

2/ Where two rates are indicated, the higher rate was used for the seventh and succeeding sprays in 1972, after mid-August in 1973, for spray applied week of 5 August and thereafter in 1974 and during periods of high inoculum pressure in 1976.

3/ - 5/ Manzer, F. E. and D. C. Merriam. 1973, 1974 and 1975, respectively.

6/ & 7/ Manzer, F.E., D. C. Merriam and E. A. Giggie. 1976 and 1977, respectively.

8/ indicates that data were not taken.

9/ Fungicides applied weekly beginning the second week of July and ending the first or second week of Sept. with high-pressure sprayer calibrated to apply 100 gal/A. Plots inoculated with Phytophthora infestans the later part of July and harvested last week of Sept. or first week of Oct.

Table 4. Percent defoliation due to late blight as a result of spraying potatoes with various fungicides on

Long Island, New York^{1/}.

Fungicide, formulation and lb ai/A/application ^{9/}	1972/ 3 Oct	1973/ 9 Oct	1974/ 17 Sept	1975/ 30 Sept	1976/ 28 Sept	1977/ 27 Sept	1977/ 11 Oct
None	99 b	94 b	72 b	96 c	93 b	70 c	99 c
Chlorothalonil 75W 1.125	8 a	2 a	4 a	6 ab	---	---	---
Chlorothalonil 6F 1.125	---	2 a	3 a	5 a	7 a	1 a	10 a
Captafol 4F 1.25	7 a	2 a	3 a	7 ab	6 a	1 a	33 b
Mancozeb 80W 1.20	7 a	2 a	6 a	14 b	3 a	3 ab	52 b
Metiram 80W 1.20	6 a	2 a	4 a	7 ab	5 a	2 a	76 b
Fentin hydroxide 47.5W 0.21	8 a	---	5 a	17 b	2 a	---	---

1/ Tests conducted using the 'Green Mountain' cultivar in 1972, 1973, 1974 and the 'Hudson' cultivar in 1975, 1976 and 1977. Small letters indicate Duncan's multiple range groupings that do not differ at the 5% level.

2/ - 7/ Cetas, R. C. 1973a, 1974a, 1975a, 1976a, 1977a and 1978, respectively.

8/ --- indicates fungicide not tested.

9/ Fungicides applied weekly between mid-July and first week of Oct. with a high-pressure sprayer calibrated to apply 100 gal/A, except between 18 and 29 Sept. 1975 and 13 and 29, 1977 when sprays were delayed due to ca. 5 inches of rainfall. Plots inoculated with Phytophthora infestans the latter part of August each year.

Table 5. The effect of fungicide applications on early blight infection and potato yield.

Treatment	Rate per acre	Number of applications	1965 Percent Infection			Yield (cwt/A)	
			7-15	8-2	8-25	U.S. #1	Total
Control			0.3 a ^{1/}	2.8 a	70.7 a	97.7 a	200.1 a
Manzate D	2.0 lb	6	0.0 b	0.7 b	2.1 b	127.2 b	227.3 b
Manzate D	2.0	4	0.1 a	2.0 a	3.7 b	135.9 b	242.4 b
	Rate per acre		1967				
			8-10	8-24	9-7 ^{2/}		
Sprinkler Irrigation							
Control			4.0 a ^{1/}	33.3 a		46.3 a	104.1 a
Difolatan 80 Wettable	1.5 lb		0.7 b	4.1 b		52.4 a	111.7 a
Difolatan 4 Flowable	1.2 qt		0.9 b	2.5 b			
Manzate D	1.5 lb		0.8 b	1.2 b			
Row Irrigation							
Control			3.1 a ^{1/}	20.7 a	57.0 a	73.8 a	141.5 a
Difolatan 80 Wettable	1.5 lb		1.0 b	3.3 b	4.0 b	87.2 b	158.1 a
Difolatan 4 Flowable	1.2 lb		0.8 b	2.7 bc	4.4 b	89.3 b	159.3 a
Manzate D	1.5 lb		0.6 b	1.8 c	2.1 b	89.9 b	160.5 a
			1968				
			8-7	8-20	8-28		
Control			30.8 a ^{1/}	98.9 a	99.8 a	46.2 b	108.1 a
Difolatan 80 Wettable	1.50 lb		3.2 b	14.2 b	15.7 c	49.6 bc	130.4 a
Difolatan 4 Flowable	1.20 qt		1.4 bc	4.3 cd	6.3 ef	60.0 ab	123.5 a
Dacohil 2787	1.50 lb		0.3 c	6.6 cd	4.3 fg	53.1 bc	126.5 a
Daconil 2787	1.00 lb		1.4 bc	5.6 cd	9.6 d	81.7 a	155.6 a
Daconil 2787	0.75 lb		1.2 c	8.7 c	9.1 d	57.7 ab	151.3 a
Daconil 2787	0.50 lb		2.3 bc	18.1 b	22.6 b	65.0 ab	145.2 a
Manzate D	1.50 lb		0.6 c	4.0 d	3.7 g	33.5 c	124.8 a
Manzate D	1.00 lb		0.7 c	5.9 cd	5.8 f	52.9 bc	141.3 a
Manzate D	0.75 lb		0.6 c	7.5 cd	9.2 e	64.6 ab	139.0 a

^{1/} Means with the same letters do not differ significantly at the 5% level.

^{2/} Disease evaluations in the sprinkler irrigation plots were not possible on 9-7 due to foliar damage caused by drift of vine killer from adjacent fields.

^{3/} Harrison & Venette 1970

Table 6.

Results of treating potato seedpieces for control of Fusarium decay in Virginia, 1974.

Fungicidal treatment	Superior				Norchip			
	Stand	% Fusarium ¹ /infection	Yield cwt/A	% Stand	Stand	% Fusarium ¹ /infection	Yield cwt/A	

Small letters indicate groupings of treatments that are not significantly different at the 5% level.

11/ Percentage of seedpieces with Pusarium decay about 20 weeks after treating in 1974.

6/ Baldwin, R. E. 1974.

Table 7. Results of treating potato seedpieces for the control of seedpiece decay, Rhizoctonia stem canker and Verticillium wilt in 1974^{1/}.

Cultivar and seedpiece treatment	%	Disease ratings ^{2/}			Yield cwt/A
		Rhizoctonia stem canker	Verticillium ^{3/} Wilt Tubers		
<u>'Katahdin'</u>					
None	80 a	3.3 a	2.7 a	4.3 a	167 a
Mancozeb 8% dust	100 b	1.7 b	1.8 b	2.4 b	240 b
<u>'Russet Burbank'</u>					
None	84 a	2.6 a	2.5 a	3.0 a	153 a
Mancozeb 8% dust	100 b	1.2 b	1.6 b	2.5 a	231 b
<u>'Kennebeck'</u>					
None	78 a	3.6 a	3.5 a	4.0 a	163 a
Mancozeb 8% dust	100 b	2.3 b	2.8 b	2.3 b	274 b

^{1/} Test conducted at the Agway Farm Research Center, Fabius, New York.

Abdel-Rahman, M. 1975. Small letters indicate groupings of treatments not significantly different at the 5% level.

^{2/} Disease ratings were based on a scale of 0 to 5 when 0 represents healthy plants or tubers and 5 severely affected plants or tubers.

^{3/} Wilt base on plant symptoms in the field and tuber scores based on amount of stem end discoloration after harvest.

Table 8. Results of treating potato seedpieces with various fungicides for the control of scab in Maine, 1966 and 1971.

Type of seed and fungicidal treatment	Lb scabby tubers per plot ^{1/}	
	light	heavy
<u>1966 (Katahdin cultivar)^{2/}</u>		
<u>Scab-free:</u>		
Semesan Bel WS dip, 1 lb/7.5 gal	0.03 a	0.00
<u>Scabby:</u>		
Not treated	7.47 c	0.88
Metiram 7% dust 1 lb/cwt	2.61 b	0.32
Captan 7.5% dust 1 lb/cwt	4.30 b	0.17
Captan 5.0% dust 1 lb/cwt	7.05 c	0.72
<u>1971 (Katahdin cultivar)^{3/}</u>		
<u>Scab-free:</u>		
Mancozeb 8% dust 1 lb/cwt	0.0 a	-0.1 a
<u>Scabby:</u>		
Not treated	8.9 d	11.8 b
Mancozeb 8% dust 1 lb/cwt	2.3 ab	0.6 a
Metiram 8% dust 1 lb/cwt	5.4 bc	3.0 a
Metiram 7% dust 1 lb/cwt	6.9 cd	2.0 a

^{1/} Average of five 10-ft plots; light = tubers with one lesion to 20% of surface area covered by scab lesions, heavy = tubers with 20% or more surface area covered by scab lesions. Negative values resulted from covariance analysis to adjust for yield differences. Small letters indicate groupings of treatments not significantly different at the 5% level.

^{2/} Manzer, F. E. and D. Merriam 1967.

^{3/} Manzer, F.E., D. C. Merriam and R. L. Alexander 1972.

Table 9. Results of treating potato seedpieces for the control of scab on Long Island, New York, 1975.

Type of seed and fungicidal treatment	%	Yield cwt/A ^{2/}	% scabby tubers	Scab index	
				All tubers	Scabby tubers
<u>Scab-free:</u>					
None	94 a	326 a	3.6 ab	1.85 abc	5.8 ab
Mancozeb 8% dust	95 a	398 b	0.4 a	0.02 a	2.8 a
<u>Scabby:</u>					
None	88 a	307 a	15.0 d	3.04 c	20.0 c
Captan 7.5% dust	99 a	302 a	4.5 bc	0.56 ab	12.1 bc
Mancozeb 6% dust	96 a	305 a	6.5 bcd	1.02 abc	14.8 bc
Mancozeb 8% dust	95 a	319 a	4.3 abc	0.69 ab	14.8 bc
Metiram 7% dust	96 a	331 a	6.6 bcd	1.04 abc	15.0 bc

^{1/} Tests conducted using the 'Katahdin' cultivar. Small letters indicate Duncan's multiple range groupings of treatments that do not differ significantly at the 5% level. Cetas 1976d.

^{2/} Two-inch minimum sized tubers.

Table 10. EBDC fungicides and registered alternatives on potatoes.

Fungicide	Common formulations, general use patterns and approximate cost of formulation.
EBDC's	
Mancozeb:	8% dust, most commonly used seedpiece treatment, \$23.00/100 lb. 80% wettable powder, most commonly used fungicide for late and early blight control, \$1.62/lb.
Maneb:	80% wettable powder, use as foliar spray declining, cost about same as mancozeb.
Zineb:	Limited use both as seedpiece treatment and as foliar spray, not as effective as maneb or mancozeb.
Metiram:	7% dust, limited use as seedpiece treatment, cost about same as 8% mancozeb, reports of phytotoxicity with some formulations. 80% wettable powder, limited use as foliar spray for late and early blight, cost about same as 80% mancozeb.
Captan:	5-10% dust, the major alternative for EBDC's as seedpiece treatment, dermal irritation to humans has been reported, \$26.00/100 lb for 7.5% dust.
Thiabendazole	45% flowable (registered for seed potatoes going into storage) presently minor usage but very effective against Fusarium seedpiece decay and potentially a major alternative (\$75.00/gal 45% F).

Table 10 (continued)

Fungicide	Common formulations, general use patterns and approximate cost of formulation.
Chlorothalonil:	6 lb active ingredient/gal flowable; most widely used alternative for foliar blight sprays (\$28.00/gal GF).
Captafol	4 lb active ingredient/gal flowable, a widely used major alternative for foliar blight sprays; dermal irritation in humans has been reported (\$10/gal 4F).
Triphenyltin hydroxide	48% wettable powder; a limited use alternative as foliar blight spray; not generally as effective as major alternatives, very narrow margin of safety between effective late blight control and phytotoxicity, used occasionally in combination with mancozeb for late blight control. (\$15/30 oz, 48% WP).
Anilazine	50% wettable powder; a very limited use alternative as foliar spray for early blight but not as effective as major alternatives, ineffective against late blight. (\$3.00/lb, 50% WP)
Copper formulations:	Usually basic, 56% Cu not used since advent of EBDC's; not as effective as major alternatives; phytotoxic effects; difficult to apply.

Table 11. EBC's and Viable Alternatives, recommended rates and approximate costs of treatment.

Treatment	Rate Active ingredient/acre	Cost per lb active ingredient	Cost active ingredient per acre treatment
Foliar:			
EBC's (as mancozebs) 80% wettable powder	1.6 lb	1.90	3.00
Captafol 4 lb active/gal flowable	1.5	2.50	3.80
Chlorothalonil 6 lb active/gal flowable	1.125	4.70	5.30
Seedpiece treatment:			
	Active ingredient per 100 lb seed		
EBC's (as mancozebs) 8% dust	.08 lb	1.90	3.00
Captan 7.5% dust	.075 lb	1.90	2.85

Table 12 Estimated* usage of EDBC's on potatoes in the U.S. in 1976

	Acreage Exposed	Acreage Treated	Average Frequency	% Treated acreage on which EDBC's used	Volume EDBC's (active ingredient)
Late and/or early blight foliar spray	660,000	599,000	6.1 x	65	3.8×10^6 lb
Early blight foliar spray	714,000	557,000	2.5 x	60	1.3×10^6 lb
Seedpiece treatment	1,374,100	1,078,000	1 x	65	1.1×10^6 lb
Total actual EDBC usage:					6.2×10^6 lb EDBC

*Estimates based on survey of potato specialists and fungicide suppliers throughout the U.S.

TABLE 13. Comparison of General Characteristics of EBDC's with Viable Alternatives on Potatoes

Fungicide	Year Introduced	Phytotoxicity (Potato)	Acute Toxicity	Pathogen Resistance (Potato)	Integrated Pest Management Programs (Potato)
EBDC's					
Mancozeb	1961	none	7,500 mg/kg slight skin irritant	none	Compatible most insecticides including oil sprays.
Metiram	1958	none	6,200 mg/kg slight skin irritant		Broad spectrum action against fungi except powdery mildew protectant. Short residue life.
Zineb	1943	none	5,200 mg/kg slight skin irritant		
Maneb	1950	none	6,700 mg/kg slight skin irritant		
Captan	1949	none	9,000 mg/kg moderate skin irritant	none	Compatible most insecticides except oil sprays. Broad spectrum action. Protectant.
Captafol	1961	none	6,200 mg/kg	none	Compatible most insecticides. Broad spectrum action except powdery mildew. Protectant. Longer residual activity.
Chlorothalonil	1964	none	10,000 mg/kg skin irritant allergenic response	none	Compatible most insecticides including oil sprays. Broad spectrum action includes powdery mildew. Protectant-eradicant. Longer residual activity.

¹Some formulations as seedpiece dust were phytotoxic. It has not been established whether the metiram or some other ingredient was the cause.

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MUSHROOMS

Efficacy of Zineb as a Fungicide

Because it is a fungus itself, the mushroom is particularly susceptible to fungal diseases that thrive in the environmental conditions the mushroom depends on. New disease threats arise to meet changes in cultural practices brought about to resist existing threats or to increase productivity. One such crisis rose in the 1940's just prior to the introduction of zineb in 1950.

By the fall of 1947, the situation was becoming alarming. Dactylium mildew, Mycogone, and Verticillium spot were so prevalent that even in the first break (harvest) nearly half the mushrooms were spotted or diseased and by the end of the third break only an occasional mushroom escaped infection. The only reasonable solution appeared to be the discovery of a fungicide that could be applied to the beds to kill the pathogens without injuring the mushrooms.⁽¹⁾.

The worst of these diseases was, and still is, Verticillium malthousei (dry bubble disease),^{U(2)} for which zineb is the only effective defense. Zineb is also effective against other fungal pathogens such as Dactylium (mildew), Mycogone (wet bubble), and Trichoderma (green mold),⁽¹⁾ as well as at least one viral infection (Lafrance disease).

1 Sinden (3) has provided a complete overview of mushroom
2 cultivation and of pathogens and weed-molds affecting the culture.
3 His description of the pathogen Verticillium malthousei follows:
4

5 Verticillium malthousei Ware causes a serious and
6 widespread disease of the sporophores, perhaps the
7 most destructive, and certainly the most ubiquitous
8 of all pathogens of the mushroom. It is endemic on
9 nearly all farms.... Infection of young mushrooms
10 produces small, deformed, undifferentiated, non-
11 necrotic spheres, called dry bubbles, with a dry
12 surface covered with a dusty gray layer of conidia.
13 Later infections on the surface of the large sporo-
14 phores develop into localized, brown, depressed,
15 necrotic spots also soon covered with the fine
16 grayish layer of spores....

17 Intensive production in air-conditioned rooms on
18 trays, where six to seven crops per year are grown,
19 in contrast to three or at most four crops on a shelf-
20 bed farm, necessitates a high relative humidity of 90-95%
21 and a temperature of 59-63°F. These are exactly the
22 conditions most conducive to dissemination, inoculation,
23 incubation, and infection of Verticillium malthousei. This
24 pathogen, transmitted primarily by living agents such as
25 pickers and parasitic flies, to which the adhesive spores
26 cling, and disseminated secondarily from primary infections
27

1 by water droplets splashed during watering of the beds
2, is difficult to control without resorting to chemical
3 eradicants or protectants...

4
5 Since ecological control of Verticillium spot by reduction of the
6 temperature and/or humidity is usually impractical, a selective fungi-
7 cide is an imperative. One of the earliest fungicides assayed was
8 Bordeaux mixture but it causes injury to the mushroom mycelium so
9 that any mushrooms on the bed at the time of application are made un-
10 salable. In contrast, metal salts of ethylenebisdithiocarbamate
11 specifically target certain fungi since toxicity depends on the pres-
12 ence in a fungus of an enzyme mechanism for reducing the sulfur in the
13 thiocarbamate to H_2S (1). Experience indicates that specificity
14 for Verticillium vs. mushrooms is not total but that the sensitivity
15 difference is sufficient to provide efficient and manageable control.

16
17 Some idea of the potential losses without effective control of
18 Verticillium and other fungi can be obtained by comparing production
19 records from early periods with present production. A 1948 reference
20 showed typical mushroom production rates of 1-1/2 lb/sq. ft./filling,
21 (4) which is only about half of present rates. (A "filling" is one
22 use of a given bed area.) Much of the increase since then may be
23 attributable to improvements through other pesticides as well as
24 fertilizers and other cultural innovations, so quantitative losses now
25 from a zineb cutoff would be unlikely to exceed 50%. However, quali-
26 tative losses would also have to be considered.
27

1
2 Early experiments investigating potential control agents for
3 Verticillium compared Bordeaux mixture with the ferric (Fermate
4 or ferbam) and zinc (Zerlate or ziram) salts of dimethyl dithiocar-
5 bamate. It was shown that Bordeaux mixture gave no better control
6 than the checks (1).

7
8 Additional experiments showed that both of these dithiocarbamate
9 fungicides provided higher yields as well as higher percentages of
10 healthy mushrooms, and that the newer EBDC formula, Parzate (or zineb),
11 was superior to both of them. The data from these tests (shown in
12 Figure 1) indicate the untreated trays yielded 14.7 lbs/tray with
13 54.8% disease incidence, while the trays treated with Parzate (i.e.,
14 zineb) produced 16.6 lb/tray with a 31.1% disease incidence. These
15 results demonstrated a zineb efficacy of 12\$ more mushrooms with a 23%
16 lower disease incidence. Another experiment in which zineb concentra-
17 tions were varied showed an average increase of 16% in yield and 20%
18 in mushroom size relative to the check plots (1).
19
20
21
22
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27

COMPARISON OF FERMATE, ZERLATE AND PARZATE

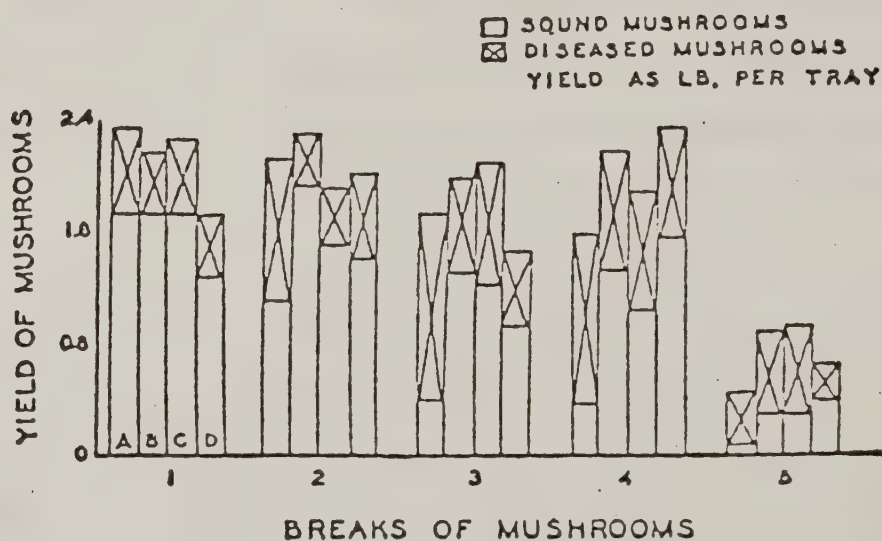
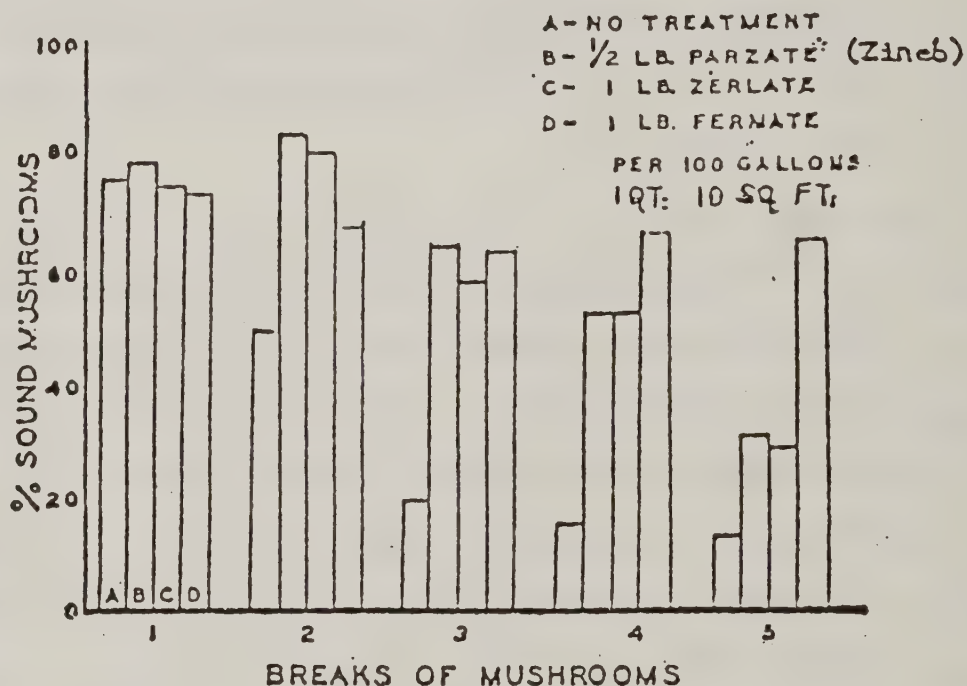


Figure 1 (Fig. 3, Ref. 1)

1 Dusting with zineb, as opposed to spraying, was subsequently
2 established as the preferred mode of application. Table I presents
3 data on a comparatively recent series of experiments designed to
4 compare spray dosages and times of applications with dusting. The
5 dust treatment generally yielded slightly lower than the other
6 treatments (including the check) but was consistently superior in
7 controlling disease.

8
9 Table II presents some results of more recent tests comparing
10 pathogen control measures. By chance the Verticillium spot in these
11 three tests was so heavy that without zineb virtually no salable
12 mushrooms would have been harvested. With zineb the spot was brought
13 into tolerable limits with reduction of about 15% in the number of
14 spotted mushrooms in two tests, and of almost 85% in the third test.
15 Yields were increased with zineb by 5% in two of the tests and by 0%
16 in the third.

17
18 Table III (which incidentally shows the overwhelming effects of
19 Verticillium spores deliberately added to the mushroom beds at various
20 times during production) indicates in the two checks that the plot
21 dusted with zineb produced 13% more mushrooms and had 18% lower
22 incidence of disease than the uninoculated plot. Since these results
23 are intermediate among the various test results and they are from a
24 well documented and relatively recent test, they will be considered as
25 the expected efficacy from the use of zineb.
26
27

Efficacy of Alternatives

There are no presently known alternatives to zineb in mushroom culture. At one time benomyl was regarded as a very promising alternative but tolerance of Verticillium to benomyl developed very rapidly. "Tolerance...often has occurred at commercial mushroom farms in as little as 9 months or less of continued benomyl usage" (6). The rapid establishment of tolerance to benomyl makes the lengthy history of use of zineb truly remarkable and the likelihood of development of a new alternative remote.

Cythion and methoxychlor have been cited as alternatives to zineb, presumably on the basis that controlling fly population will control dissemination of Verticillium spores. Malathion is presently used at many farms in conjunction with zineb as part of the total pest and pathogen control program. As already noted, however, flies are not the only mode of dissemination of Verticillium and insecticides cannot therefore be regarded as effective alternatives to zineb.

Use of ecological controls by such methods as reduction of temperature and humidity are also impractical because these environmental conditions are the very ones that are most crucial to favorable development of the mushroom.

TABLE I

Zineb Spray vs. Dust

<u>Treatment(a)</u>	<u>Dosage</u>	<u>Yield lbs/sq ft</u>	<u>Bubble/tray(b)</u>	<u>After 35 day %Soot(b)</u>
2 lb. Zineb	single	2.17	9.5	4.21
2 lb. Zineb	multiple	2.20	12.8	6.47
8 lb. Zineb	single	2.16	8.5	4.49
8 lb. Zineb	multiple	2.21	7.8	5.98
16 lb. Zineb	single	2.20	9.9	4.94
Check (no zineb)		2.16	27.6	9.06
Zineb dust		2.10	0.6	0.33

(a) Treatments lbs/100 gal. applied day after casing for single dosage. Multiple dosages applied day after casing and after normal watering when pins had formed and between breaks. Multiple dosages ranged 7 to 9.

Dust applied 3 times/week.

(b) Average 6 tests.

Source: Butler County Mushroom Farm, Inc., PA.

TABLE II

Zineb Dust vs. Verticillium

<u>Treatment</u>	<u>lb/sq ft</u>	<u>lb/lb d wt</u>	<u>Bubble/tray</u>	<u>% Spot^a</u>
Test 1				
Check ^b	2.49	0.58	3/5	18.9
Zineb dust ^c	2.35	0.61	3/5	3.5
Test 2				
Check ^b	2.38	0.54	22/5	33.3
Zineb dust ^b	2.55	0.58	0/5	19.8
Test 3				
Check ^b	2.35	0.56	12/5	88.6
Zineb dust ^b	2.35	0.56	9/5	3.9

^aSpot count started 35 days after casting.

^b60 lbs. compost/tray.

^c55 lbs. compost/tray.

Source: Butler County Mushroom Farm, Inc., PA.

TABLE III

Effect of Verticillium malthousei inoculum on mushroom yield,
Verticillium bubble and spot incidence.

Treatment ^a (Time inoculated)	Yield (lb/ft)	Verticillium bubbles/5 ft tray	% Verticillium spotted mushrooms of total picked
Check - noninoculated ^b	2.49	182	21
Casing	1.09	823	64
7 days	1.13	966	66
14 days	1.00	1021	74
21 days	1.67	518	59
28 days	2.30	283	27
Check - zineb dusted ^c	2.87	12	3

^aEach treatment had five trays (5 ft² x 6 inches deep) per test,
repeated three times for a total of 15 trays per treatment.

^bNoninoculated check refers to the check not inoculated with
Verticillium spores. The other treatments except the zineb dust
check were inoculated at the indicated times by atomizing the
trays with 5000 Verticillium malthousei spores/cc water.

^cThe zineb dusted check was grown in a small room separate from
the other treatments, dusted three times per week with 15% zineb and
was not inoculated with Verticillium. zineb = zinc ethylenebis-
(dithiocarbamate)

(Table 2. Ref. 5)

FRUIT

Eastern Apples.

Current use patterns of EBDC's and alternatives

Forty-three of 49 eastern tree and small fruit pathologists responded to a letter inviting them to submit information on EBDC fungicide usage on fruit crops in their states and to evaluate advantages and disadvantages of alternative materials (Table 1). From the responses to this survey one can detect three typical general use patterns of EBDC's on apples in the East.

In the northern states (167,000 acres, approx. annual production 1.8 billion pounds, Table 2), apple scab is the major disease. EBDC's are used along with captan as alternate materials for benomyl and dodine in areas where resistance to these compounds has occurred in the apple scab organism (Venturia inaequalis) (Gilpatrick, Jones, Klos, McGee, 1977). Aerial application programs in Vermont have achieved control of scab and the rust diseases at reduced rates using combinations of mancozeb or metiram with benomyl (Gotlieb, 1977). EBDC's are also used for control of the minor diseases, sooty blotch and fly speck.

In the mid-Atlantic region (95,000 acres, approx. annual production 1.2 billion pounds, Table 1) the disease spectrum includes scab,

powdery mildew, rusts, and fruit rots or "summer diseases." EBDC's are widely used because of economical broad spectrum control, acceptable fruit finish, compatibility with dinocap for powdery mildew control, and compatibility with most commonly used insecticides. Dikar (a formulation of mancozeb and dinocap) and other EBDC's are well suited to integrated mite control programs because of nontoxicity to the beetle predator, Stethorus punctum (Bode, Petersen, Springer, 1977). Use of zineb for late season disease control can eliminate the need for an additional application of an alternate material which has weaker weathering properties (Hickey, Lewis, 1977).

The EBDC usage pattern of the lower mid-western states (Ohio Missouri, 38,000 acres, approx. annual production 340 million lb., Table 1) is represented by characteristics of Northern and mid-Atlantic regions including broad spectrum disease control, utility in integrated mite control programs, and tank mixtures with benomyl to reduce the threat of benomyl-resistant apple scab (Pecknold, Ries, Spotts, Steiner, Stuckey, 1977).

Fruit rots, scab, rust, and powdery mildew are the major apple diseases in the southeastern states (34,000 acres, 342 million lb annual production, Table 1). The major disease problem is fruit rots; also scab, rust, and powdery mildew. In some areas EBDC's are the only presently available materials capable of adequately controlling the fruit rots under the warm, humid weather conditions which are common during the fruit ripening period in the Southeast (Clayton,

1 McGlohon, Zehr, 1977). The problem of benomyl resistant apple scab is
2 apparent in one area of this region (Sutton, 1977).
3

4 Although these disease and use patterns are generally typical of these
5 regions, local weather factors such as rainfall and temperature can
6 quickly alter the disease complex to favor an epiphytotic by one
7 fungal organism and reduce the threat from another organism. In many
8 areas the major disease problem will vary from year to year depending
9 on the prevailing weather conditions during the particular growing
10 season.
11

12 The development of the diseases for which the EBDC fungicides are
13 registered is generally favored by wet periods long enough to allow
14 fungal spores adequate time to germinate and infect susceptible plant
15 tissues. Control of orchard diseases with EBDC fungicides is based
16 upon the maintenance of a protective fungicide residue on the plant
17 surface to prevent the germination of spores and subsequent infection
18 during wet periods. Because heavy rains will reduce the fungicide
19 residue somewhat, application frequency is determined to some extent
20 by the frequency and extent of rainfall and by the amount of plant
21 growth since the last application. The advantage of the EBDC fungi-
22 cides and disadvantages of alternate materials as reported by eastern
23 fruit pathologists will be discussed in greater detail later in this
24 chapter.
25

26 Use survey data from three specific areas indicate grower pref-
27 erence and need for EBDC fungicides in apple disease control programs.

1 Extension personnel of the University of Illinois survey orchards at
2 harvest annually for fruit quality and insect control programs (Ries,
3 1977). Four year's sampling data (1973-1976) show that 41% of all
4 fungicide applications involved EBDC materials, including Dikar,
5 Polyram and zineb (Table 3). The only alternative compound used for
6 rust control was ferbam, used a total of 3 times or 0.2%. A grower
7 preference for the Dikar formulation as the means of applying dinocap
8 for powdery mildew control is evidenced by the fact that dinocap was
9 applied only once separate from the 245 Dikar applications.

10
11 Similar usage patterns were also noted in North Carolina where the
12 Apple Pest Management Project, 1976, summarized grower spray schedules
13 for 48 randomly selected orchard blocks totalling 400 acres directly
14 representing about half of the apple acreage in the state (Sutton,
15 1977). Eighty-three percent of the sampled acreage received at least
16 one EBDC application (Table 4). Carbamate fungicides represented 37.8
17 of the total of 820 applications, and 82% of the carbamate materials
18 were EBDC's. Dinocap was applied as the Dikar formulation in 92.5% of
19 all applications involving dinocap.

20 In Northern Virginia, a 1977 survey of grower consultants, distri-
21 butor sales people and growers was estimated to include 75% of all
22 fruit fungicides used in northern and central Virginia, West Virginia,
23 and Maryland (Yoder, unpublished). By weight of formulated material
24 carbamate fungicides represented 52% of all fruit fungicides. Ninety-
25 one percent of all carbamates were EBDC's. Dikar represented 96% of
26 all dinocap used.
27

1 In most geographic regions EBDC's are applied at rates of one to
2 two pounds formulated material per 100 gallons of water as a dilute
3 tank mix to be applied at 300-400 gallons per acre of large apple
4 trees, or at an appropriate rate per acre when applied as a concen-
5 trate spray increasing the concentration of the material in the spray
6 tank, but reducing the amount of water applied to less than 300 gal-
7 lons per acre. In practice, much orchard spraying is accomplished
8 with 100 gallons of water per acre or less, and the amount of fungi-
9 cide applied per acre may be reduced by as much as 25% because of more
10 efficient deposition on the plant surface due to reduced run-off at
11 lower gallonages per acre (Lewis and Hickey, 1972). The actual rate
12 may vary from four to eight pounds of formulated material per acre
13 depending on the size of the trees, the density of the orchard
14 planting, the degree of disease potential, and the method of
15 application.

16 The amount of a fungicide used per application is also frequently
17 reduced when combined with another fungicide for control of one disease
18 or a complex of diseases. For example, tank mixes of EBDC's with
19 benomyl for reducing the threat of benomyl-resistant fungi are
20 registered at the following rates per 100 gallons: Benlate + Polyram,
21 2 oz + 1 lb; Benlate + Dithane M-45, 2-3 oz + 12 oz; Benlate + Manzate
22 200, 2-3 oz + 12 oz. Recommended rates for these materials when
23 applied separately rather than as tank mixes are: Benlate, 4-6 oz;
24 Polyram, 2 lb; Dithane M-45 and Manzate 200, 1 - 2 lb. Zineb 1 lb +
25 Captan 1 lb/100 gal is a common recommendation for late summer disease
26 control in many areas of the East. One application of this combination
27

1 can replace the two applications required for similar control by
2 captan at 2 lb/100 gal. (Lewis & Hickey, 1977; Steiner et al. 1978).
3

4 The frequency of application of EBDC's varies from 7 to 14 days in
5 the early season, with longer intervals in late season. Intervals
6 between sprays may be lengthened or shortened depending on prevailing
7 weather conditions.
8

9 Registered uses and potential crop losses

10 The major registered uses of EBDC's and the potential crop losses for
11 apples in the East are listed in Table 5. Several minor apple uses
12 are also registered for one or more of the EBDC's. The potential
13 losses to major diseases indicated represent estimates of maximum
14 losses without any control measures based on observations and
15 infection data for disease control experiments. The lack of all
16 control measures would allow some diseases to build up very rapidly in
17 some areas and less rapidly in others depending on weather conditions
18 following the cessation of fungicide control. Likewise, an entire
19 production region would likely realize a gradual cumulative increase
20 in disease incidence following the adoption of a less effective
21 program due to a greater carryover of inoculum from season to season
22 (Szkolnik, 1977).
23

24 Besides prevailing weather conditions, another factor which
25 affects disease incidence in the absence of fungicides, or in the
26 presence of a weak fungicide, is varietal susceptibility. Most
27

1 present commercial apple cultivars are susceptible to scab. "McIntosh"
2 is particularly susceptible. In many areas the complete loss of a
3 season's crop is possible. A tree may be so severely affected that
4 the number of fruit in the following season is greatly reduced. Most
5 of the cultivars are susceptible to one or more of the fruit rots.
6 The Stayman cultivar is particularly susceptible to brown rot because
7 of the tendency for its skin to crack under physiological stress
8 allowing the fungus a point of entry.
9

10 Efficacy and availability of EBDC's and alternatives

11

12 The effectiveness of a fungicide against the most prominent
13 pathogens in the disease spectrum is the major consideration for its
14 use. The general advantages of the EBDC fungicides over the possible
15 alternatives as described by fruit pathologists are outlined in Table
16 6. General preference for these materials seems to be based on their
17 economical broad spectrum control, their adaptation to integrated pest
18 management programs, and their acceptable effect on fruit finish. The
19 major diseases on which EBDC's exert outstanding control are the rusts
20 black rot, white rot, bitter rot, sooty blotch, and fly speck. The
21 EBDC's are slightly less effective on apple scab than some other
22 fungicides and are not effective on powdery mildew. Other advantages
23 of EBDC's include the flexibility in disease control programs provided
24 by their compatibility with most fungicides, and their suitability in
25 combination with benomyl for control of benomyl resistant strains of
26 fungi, such as the apple scab organism.
27

1 Some beneficial physiological side effects can be achieved with
2 EBDC's. Zineb, mancozeb, and metiram have been recommended for the
3 correction of zinc deficiency (Barrat, 1977; Bates et al, 1977). More
4 recently EBDC's have shown promise of correcting necrotic leaf blotch,
5 an apparent physiological disorder of the Golden Delicious cultivar
6 (Drake, Hickey, Lewis, Springer, 1977).

7
8 Because of the wide range of activity of the EBDC's, a number of
9 fungicides must be considered as possible alternatives. Of the group
10 of eight materials listed in Table 5, only ferbam and thiram cover the
11 entire range of disease control evident in EBDC's. These two mate-
12 rials each have some serious disadvantages as noted in Table 7. One
13 serious consideration would be the question of their availability for
14 rust control, and what their price would be in the event of a tempo-
15 rary or long-term shortage with declining EBDC sales competition. A
16 similar situation could exist with captan and folpet which would cur-
17 rently be the most likely replacements for EBDC's in the summer
18 control of the fruit rot diseases.

19
20 Benomyl, captafol, dichlone, and dodine would be considered as
21 EBDC replacements mainly for the control of apple scab. Captafol and
22 dichlone have excellent activity against the apple scab fungus, but
23 are seriously limited by toxicity to the plant. Benomyl and dodine
24 are also excellent apple scab materials, but extensive use in areas
25 where scab is an annual problem has led to the development of
26 resistant strains of the fungus (Jones, 1976), and this seriously
27 limits their reliability when used without the benefit of another

1 fungicide with a different mode of action such as EBDC's or captan.
2 Other materials not listed in Table 5, but which are also registered
3 for apple include glyodin, lime sulfur and sulfur. Glyodin is re-
4 garded chiefly as a surfactant and a weak scab protectant fungicide.
5 Lime sulfur has strong scab activity, but is phytotoxic. Sulfur is
6 used more for control of powdery mildew than for apple scab due to its
7 phytotoxicity at rates high enough to give adequate scab control.

8
9 The foregoing discussion of disadvantages of alternate materials
10 is not intended to obscure the fact that by evidence of their inclus-
11 sion and discussion in most eastern fruit spray publications, the
12 EBDC's and all of the alternatives are recognized as having some
13 utility. In rather complex systems of the economic mangement of a
14 spectrum of fruit pathogens and insects to produce a high quality
15 product, each fungicide has found its own rightful niche. The
16 exclusion of one group of compounds could lead to increased use of
17 other materials less effective. The end result would be reduced yield
18 and quality, increased total active ingredient required, increased
19 likelihood of pathogen resistance, and increased risk of exposure to
20 all remaining groups of materials.

21 An analysis of the benefits of the EBDC fungicides and their
22 alternatives is not complete without noting that many of the most use-
23 ful alternatives are either directly or indirectly involved with some
24 review processes related to RPAR's.
25
26
27

Phytotoxicity

A differential varietal response is also evident in the realm of injury of fruit and foliage by spray materials. Some fungicides such as dichlone, folpet and captafol may be generally injurious if applied at the wrong growth stage; others may be more harmful to one cultivar than another. Frequently, cold or warm temperatures and coincidental application of another pesticide may be factors involved in the development of symptoms of phytotoxicity. Mixtures of compounds may synergize to produce injury or to increase the safety of each depending on their nature. Some examples of susceptibility to chemical injury are: Golden Delicious (ferbam, dodine, sulfur, benomyl); Red Delicious (captan, dodine + sulfur, ferbam); Stayman (captan + sulfur, ferbam).

Phytotoxicity problems are compounded by the importance of the russet-susceptible Golden Delicious cultivar as a pollinator. Because of its wide use as a pollinator, it is often interplanted in the row with another cultivar or in rows alternated with rows of other cultivars. In either case, it is generally impractical to avoid spraying certain trees within the same orchard with a given material due to phytotoxicity problems.

No serious phytotoxicity problems have been associated with mancozeb, metiram, zineb or thiram, with the exception of reduced fruit set due to the dinocap component of Dikar (Steiner, 1977).

1 Potential for pathogen resistance

2
3 In recent years the problem of the development of fungal resist-
4 ance to fungicides has caused increasing concern (Jones, 1976). Among
5 fruit fungicides, benomyl and dodine have been particularly
6 susceptible to erosion of effectiveness on apple scab due to this
7 problem. The problem has generally appeared first under severe
8 disease conditions where dodine has been used exclusively for about
9 ten years and where benomyl has been used for about three years.
10 Because of their different chemical modes of action and their
11 compatibility with benomyl; mancozeb, metiram, and captan have been
12 registered for inclusion with benomyl in the spray tank to delay the
13 onset of tolerant strains and to reduce the threat of their appearance
14 (Jones and Ehret, 1977). In addition, many eastern spray bulletins
15 encourage the use of other materials throughout the entire season
16 (Bates et al, 1977; Flore et al, 1976; Oberly et al, 1977; Rock et al,
17 1977).

18 With a comparatively long history of exclusive usage on eastern
19 fruit crops, there has been no evidence of development of resistance
20 to any EBDC fungicides.

21
22 Integrated pest management

23
24 An outstanding benefit of the EBDC's in the East is their
25 adaptability to the integrated mite control programs which have become
26 popular as a means of reducing the total cost and amount of pesticides
27

1 needed per acre per year. The EBDC's are non-toxic to the mite
2 predators, the Black Lady Beetle, Stethorus punctum in the midAtlantic
3 regions and the mite predator Amblysieus fallacis in the Midwest (Rock
4 et al, 1977; Tetrault et al, 1977; Williams et al, 1976). Some of the
5 popularity of the Dikar formulation of mancozeb and dinocap results
6 from its suppression of the plant feeding mites while permitting
7 survival of the mite predators, and a significant cost savings by
8 purchasing the package mix formulation rather than by using the same
9 total active ingredients of mancozeb and dinocap in separate
10 packages.

11
12 In Pennsylvania the use of a "Reduced Pesticide Spray Program for
13 Apples," in which Dikar is one of several important features, was
14 estimated in 1971 to reduce total pesticides applied 45% for a savings
15 of \$58 per acre (Lewis and Hickey, 1972).

16
17 In Missouri (Steiner, 1977) a combination of mancozeb + benomyl is
18 estimated to save two or three miticide applications per season in
19 comparison to a standard captan or metiram fungicide program.
20 Compared to several other programs, this program also used the lowest
21 total amount of active ingredients per acre per year.

22 General cost considerations

23
24 Throughout the East most of the commercial fruit fungicides are
25 generally competitive in price considering their spectrum of disease
26 control, use rate, longevity on the plant, etc. A difference has been
27

1 noted, however, between the price of Dikar and the cost of mancozeb
2 and dincap if purchased as separate formulations. As of February 1,
3 1978, at typical medium to large grower purchase volumes, Dikar (72%
4 mancozeb, 4.7% dinocap) costs \$1.34/lb, Dithane M-45 (80% mancozeb)
5 costs \$1.35, and Karathane WD (19.5% dinocap) costs \$1.95 (Labbee,
6 1978). The same quantity of active ingredients available for \$1.34 in
7 one pound of Dikar will cost \$1.68 if purchased separately. Thus, a
8 savings of 34 cents is realized for each pound of Dikar sold in the
9 country.

10 11 Basis for economic analysis

12
13 An analysis of the economic benefits of EBDC fungicides on eastern
14 apple production is outlined in another section of this document.
15 Presented here are observations and assumptions which serve as the
16 basis for this analysis.

17
18 The economic analysis focuses on two major production regions and
19 their EBDC usage patterns: the Southeast and the mid-Atlantic and
20 lower mid-western states. The analysis is based on typical usage
21 patterns and the production and acreage in these regions. It is
22 recognized that all growers in the region may not be following the
23 typical usage pattern because of different disease conditions. It is
24 likely, however, that disease control practices by many growers in
25 states bordering these regions would also fit the EBDC usage pattern
26 for these regions.

The fruit rots are the most serious disease problem in the Southeast with bitter rot (Glomerella cingulata) being one of the most difficult to control under severe conditions. Preventive treatment prior to infection with as many as eleven or more applications controls this and other diseases. EBDC's are preferred for control of bitter rot in North Carolina (Rock et al, 1977) with folpet (Phaltan) being the next best alternative. Under North Carolina test conditions in 1976 Dikar 2 lb/100 gal permitted only a 2% loss of fruit, followed by Phaltan 2 lb/100 gal (30% loss) and captan 2 lb/100 gal (61% loss) (Clayton and Sutton, 1977). The Phaltan-treated trees also suffered foliar chemical injury. In 1977 typical grower prices were \$1.27 per lb for Dikar and \$1.35 per lb of Phaltan. Application volumes are 400 gal per acre with the fungicide concentrations used in the test, or the same amount of active material per acre where reduced gallonages are applied to large trees. Grower prices for high quality Golden Delicious have ranged from \$7.00/100 lb in 1975 to \$12.00/100 lb in 1977.

This test illustrates the destructive nature of bitter rot and the potential difficulty in its control without EBDC fungicides. The 28% loss in rotted Phaltan-treated fruit probably would have been more than a 28% loss in value because infection data were taken three weeks before harvest. Under commercial conditions additional sorting costs would likely be accrued to remove more rotted fruit after harvest. The disease may not be this severe in every southeastern orchard every year, but loss of the most effective materials would likely result in an overall increase in rot incidence under adverse weather conditions.

Economic analysis of loss of the benefits of EBDC's in the mid-Atlantic and lower mid-West is based on differences in disease control and pest management:

- a) cost of at least one additional miticide application with the loss of the integrated pest management benefits of EBDC's.
- b) cost of an additional application of an alternate material due to the loss of zineb in the late season sprays.
- c) additional costs for alternate disease control materials in early and mid-season sprays.

Prices for alternate materials are typical grower prices for 1977 in Northern Virginia. Biological reasons for the required spray schedule alterations are based on spray bulletins and comments by eastern fruit pathologists. Cost of application/acre is approximately \$2.00 (Lewis and Hickey, 1972, from a range of \$1.41-\$2.32). The following points refer respectively to the items listed above for the aforementioned regions:

- a) The EBDC fungicides are compatible to integrated mite control programs as discussed earlier. Their loss in the spray program we estimate would require an additional miticide such as Plictran (Steiner et al, 1978) 0.75 lb/A or \$9.00/A plus the cost of application. If captan is relied on as the alternate fungicide, possibly more than one additional miticide may be required in some

1 areas due to its tendency to permit an increase in phytophagous
2 mite populations (Clayton and Sutton, 1976; Lewis and Hickey,
3 1972).

4
5 b) Zineb is widely recommended in late season cover sprays in
6 combination with captan for its longer residual effectiveness on
7 sooty blotch and fly speck diseases which can cause a serious loss
8 in grade of fruit (Lewis and Hickey, 1977). Additional costs over
9 the treated acreage would include 4.5 lb captan/A (Steiner et al,
10 1978) at 95¢/lb plus the cost of application at \$2.00/A.

11
12 c) Alternate materials for disease control selected from the 1977
13 Pennsylvania Tree Fruit Production Guide (Tetrault et al, 1977) and
14 typical 1977 Virginia prices for formulated materials include:
15 captan, 95¢/lb; thiram, \$1.35/lb; dinocap, \$2.39/lb; benomyl,
16 \$7.30/lb; superior oil, 38¢/qt.

17 Plums and prunes

18
19 Zineb is widely used for control of the black knot disease (Dibotryon
20 morbosum) attacking the twigs, branches, and trunks of prune trees
21 (Lewis Hickey, 1959). Eastern plantings total about 8800 acres in
22 Michigan, York, Pennsylvania, Ohio, and Maryland. Benomyl is an
23 effective alternative for zineb (Ritchie, et al, 1975), but because of
24 the potential for fungal resistance to benomyl, zineb should be
25 retained and recommended as a tank mix or alternate application with
26 benomyl. No other alternative materials are acceptable
27

1 due to phytotoxic potential. As an additional control practice,
2 growers are encouraged to remove wild plum and cherry trees from the
3 vicinity of the orchard and to prune out and destroy overwintering
4 knots from infected trees (Anderson, 1956). This practice is only
5 partially successful, however, because some infections are invisible
6 during the dormant season, and small sporulating knots may be obscured
7 by the foliage while the tree is in active growth. Evidence of the
8 explosive nature of this disease is the fact that three knots left in
9 one tree resulted in over 1100 new infections in a single growing
10 season (Ritchie et al, 1975). Without fungicides we estimate that at
11 least 4,000 acres containing approximately 400,000 trees would
12 gradually become infected and would be lost to production.

13 14 Grapes

15
16 Maneb and mancozeb are critical to about 3000 acres of muscadine
17 grape production in the Southeast. The best alternative, folpet, is
18 less effective than these materials for control of fruit rots, parti-
19 cularly ripe rot (Glomerella cingulata), and this acreage would likely
20 be lost to production (Clayton, 1977).

21
22 Maneb and mancozeb are also used on approximately 5000 acres of
23 grapes in Ohio (Spotts, 1977) and Missouri (Steiner, 1977) where they
24 are preferred because of superior control of black rot and downy
25 mildew.

1 Restriction of EBDC's would affect a changing variety picture in
2 New York, because of the move toward the planting of French hybrid
3 grapes. These cultivars are susceptible to downy mildew and would
4 need mancozeb for disease control as evidenced by the heavy EBDC usage
5 on grapes in Europe.

6 Cranberries

7
8 Although some EBDC's are used in cranberry production, they are
9 not applied directly to water in the production operation. In
10 Wisconsin and Oregon the crops are grown and harvested as dry land
11 agriculture. In Massachusetts (Cross, 1977) and New Jersey (Marucci,
12 1977) fungicides are applied to cranberries only during bloom periods
13 to control fruit rots. The bogs are drained before bloom and are not
14 reflooded until approximately 42 days after fungicide application in
15 New Jersey and 64 days in Massachusetts. All fungicide application is
16 on unflooded land.

17 Western deciduous tree fruits

18
19
20 In general, EBDC's are used much less extensively on deciduous
21 tree fruits in the West than in the East because wet weather fungi are
22 not as prominent under the dry climatic conditions in the western
23 fruit-growing regions. One important use is noted, however, in
24 Washington and Oregon where EBDC's are applied to pears for control of
25 pear psylla nymphs. These sucking insects are capable of reducing
26 tree vigor by their feeding and give off honeydew which serves as a
27

1 substrate for sooty mold fungi which shade the tree. They also
2 transmit the lethal pear decline disease. An estimated 20,000 acres
3 are treated (50% of the total) with zineb at 6-8 lb/A in Oregon
4 (MacSwan, 1978), and mancozeb is used at 9 lb/A on 20,000 acres (55%
5 of the total) of pears in Washington (Covey, 1978). Research in
6 British Columbia demonstrated that mancozeb and Dikar are capable of
7 controlling pear psylla nymphs which had become resistant to numerous
8 conventional insecticides (McMullen, 1966). Mancozeb and Dikar had
9 very little effect on the predaceous insects.

10 11 Hops

12
13 Another use of EBDC's in the northwest is in the production of
14 hops. Approximately 42,000 pounds of zineb is used on 8500 acres in
15 Idaho and Oregon for control of downy mildew (*Pseudoperonospora*
16 *humili*). The alternate materials copper and streptomycin are
17 comparatively ineffective (Paulus, 1978).

18 19 Citrus

20
21 Approximately 460,000 pounds of zineb is used on Florida citrus
22 (Kahn, 1978) for control of fruit russet and greasy spot (Fisher,
23 1961). A single application of the material is made at the rate of 8
24 lb/100 gal of water per acre tank mixed with the summer oil spray
25 applied in June or July. Alternate fungicides include captafol and
26 benomyl.
27

Other fruit crops

Because of their economical broad spectrum disease control, their common availability, and their safety to plants, EBDC fungicides have been recommended on a wide range of relatively minor tree fruit, small fruit and nut crop diseases. A summary of registrations is listed in Table 2. Several relatively small acreage fruit crops on which EBDC's are used in commercial production in the East include pears, raspberries, and currants. EBDC's are also useful in home fruit production because they control most of the major diseases which would seriously damage the fruit. Their inexpensive broad spectrum control makes them especially useful because they are also adaptable for home vegetable gardens and landscape ornamentals. EBDC's have also been recommended for control of several nut diseases (W. Johnson, 1969).

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TABLE 1. EASTERN APPLE PRODUCTION

Region	Acreage ¹	Avg. Annual ² Production (million lb.)
<u>Northern</u>		
Maine		68.6
New Hampshire		56.4
Vermont		57.2
Massachusetts	27,299	87.6
Connecticut		39.8
Rhode Island		4.4
New York	66,742	869.8
Michigan	66,157	572.0
Wisconsin	7,028	45.2
<u>Mid-west</u>		
Indiana	5,193	54.9
Illinois	12,000	94.2
Ohio	11,168	113.4
Kentucky	unavailable	14.4
Missouri	8,000	63.3
<u>Mid-Atlantic</u>		
Pennsylvania	34,601	464.0
New Jersey	7,911	115.0
Delaware	unavailable	12.1
Maryland	5,837	69.8
West Virginia	18,000	216.0
Virginia	28,500	344.0
<u>Southeast</u>		
North Carolina	18,500	271.0
South Carolina	2,896	22.4
Georgia	7,000	22.0
Tennessee	unavailable	7.7
Arkansas	unavailable	18.5
TOTAL	approx. 325,000	3703.6

Total Eastern production 3.6 billion pounds, approx. annual value \$220 million

Total U. S. production 6.7 billion pounds, approx. annual value \$380 million

¹ Most recent state surveys (1972-1976).

² Five year averages (1973-1977), Statistical Reporting Service, USDA.

TABLE 2. EBDC FUNGICIDES REGISTERED FOR CONTROL OF DISEASES OF FRUITS*

Fruit	Disease	Registered EBDC
Apples	Bitter rot	Mancozeb Polyram Zineb
	Black rot	Maneb Polyram Zineb Mancozeb
	Blotch	Zineb
	White rot	Polyram Zineb Maneb
	Brooks spot	Zineb
	Brown rot	Mancozeb Polyram
	Bullseye rot	Maneb
	Cedar apple rust	Mancozeb Maneb Polyram Zineb
	Fire blight	Zineb
	Flyspeck	Mancozeb Maneb Polyram Zineb
	Frogeye leaf spot	Zineb
	Quince rust	Zineb
	Rust	Mancozeb
	Scab	Amobam Mancozeb Maneb Polyram Zineb
	Sooty blotch	Mancozeb Maneb Polyram Zineb

*Based on EPA microfiche label and registration files.

	Fruit	Disease	Registered EBDC
1	Apricots	Brown rot	Maneb
2		Green rot (Jacket rot)	Maneb
3		Leaf curl	Zineb
4		Shot hole	Maneb
5			Zineb
6	Blackberry	Anthracnose	Zineb
7		Leaf rust	Zineb
8		Rust	Zineb
9		Septoria leaf spot	Zineb
10	Blueberry	Botrytis blight	Mancozeb
11			
12	Boysenberry	Anthracnose	Zineb
13		Rust	Zineb
14		Septoria leaf spot	Zineb
15	Cherry (ALL)	Leaf spot	Zineb
16		Shot hole	Zineb
17	Citrus (ALL)	Greasy spot	Zineb
18			
19	Cranberries	Fruit rots	Mancozeb Zineb
20		Lophodermium	Maneb
21	Currant	Leaf spots	Zineb
22			
23	Dewberry	Cane rust	Zineb
24			
25	Gooseberry	Leaf spots	Zineb
26			
27			

	Fruit	Disease	Registered EBDC
1	Grapes	Bitter rot	Zineb
2		Black rot	Mancozeb
3			Maneb
4			Zineb
5		Brown rot	Zineb
6		Bunch rot (Botrytis)	Mancozeb
7			Zineb
8		Dead-arm	Mancozeb
9		Downy mildew	Zineb
10			Mancozeb
11		Ripe rot	Zineb
12	Kumquat	Greasy spot	Zineb
13	Lemons	Storage rots	Zineb
14	Loganberry	Anthracnose	Zineb
15		Septoria leaf spot	Zineb
16	Nectarine	Brown rot	Maneb
17		Coryneum blight (leaf blight, shot hole)	Zineb
18			Maneb
19		Leaf curl	Zineb
20		Leaf spot	Zineb
21		Scab	Zineb
22	Papaya	Anthracnose	Mancozeb
23		Black spot	Maneb
24			Maneb
25		Phytophthora fruit rot	Mancozeb
26			
27			

1	<u>Fruit</u>	<u>Disease</u>	<u>Registered EBDC</u>
2	Peach	Brown rot	Maneb
3			Zineb
4		Leaf curl	Zineb
5		Leaf spts	Zineb
6		Scab	Zineb Maneb
7		Shot hole (blight)	Maneb Zineb
8	Pear		
9		Bitter rot	Mancozeb
10		Black rot	Mancozeb
11		Fire blight	Zineb
12		Flyspeck	Mancozeb
13		Rust	Mancozeb
14		Scab	Mancozeb
15		Sooty blotch	Mancozeb Zineb
16		Pear psylla	Mancozeb
17	Pineapple	Heart rot	Mancozeb
18	Plum and prunes	Black knot	Zineb
19		Brown rot	Zineb
20		Leaf curl	Zineb
21		Leaf spots	Zineb
22		Scab	Zineb
23	Raspberry	Anthracnose	Zineb
24		Septoria leaf spot	Zineb
25	Strawberry	Stem rot	Zineb
26			
27			

TABLE 3. Fungicides and the Number of Applications Each Used by Members of the Illinois Quality Apple Club during the Years 1973-1976¹

Fungicide	Number of Fungicide Spray Applications ²				Total	% of Total
	1973 (22) ³	1974 (19)	1975 (25)	1976 (14)		
Benomyl	3	45	55	29	132	8.6
Captan	39	42	29	40	150	9.7
Captafol	4	4	9	9	26	1.2
Copper chem.	1	1	0	0	2	0.1
Dikar	76	59	104	45	245	15.9
Dinocap	1	0	0	0	1	0.1
Dodine	108	65	69	48	290	18.8
Ferbam	1	2	0	0	3	0.2
Phaltan	33	33	34	22	122	8.9
Polysram	53	68	64	22	207	13.4
Sulfur	74	38	23	28	163	10.6
Zineb	66	29	21	22	138	8.9
Others	0	5	8	11	24	1.6
Total EEDC's	195	156	189	89	629	40.8

¹Ries, 1977 (Condensed from Transactions of the Illinois State Horticultural Society, 1973-1976).

²The number of times the listed fungicides were applied for disease control in the years listed.

³Number of growers participating in the survey.

TABLE 4. Fungicide Applications to 48 Orchard Blocks Surveyed by North Carolina Apple Pest Management Project, 1976 (Sutton, 1977)

Fungicide	Total Applications ¹	% of Total Applications
Benomyl	161	19.6
Captan	211	25.7
Dikar	161	9.6
Dinocap	13	1.6
Dodine	17	2.0
Ferbam	33	4.0
Folpet	67	8.2
Kolofog	12	1.5
Lime sulfur	2	0.2
Mancozeb	4	0.5
Maneb	1	0.1
Polyram	70	8.5
Sulfur	25	3.0
Thiram	23	2.8
Zineb	20	2.4
Total EBDC's	256	31.2
Total	820	100.0

¹The number of times the listed fungicides were applied for disease control.

TABLE 5. Potential Uncontrolled Losses to Major Eastern Apple Diseases in the Absence of Fungicides

Major Registered Uses	Causal Organism	Potential Maximum Loss		Estimated Area Affected ²		Reference
		without treatment (%) ¹	Production (million lb.)	Acreage (thousand)	Production (million lb.)	
Scab	<i>Venturia inaequalis</i> ³	100 ³	3,000	266	3,000	Klos, Yoder et al, 1970
Rusts	<i>Gymnosporangium</i> sp. ³	75 ³	1,500	135	1,500	Anderson, 1956
Black rot	<i>Phyosporpora obtusa</i>	100 ⁴	1,600	140	1,600	Hickey, 1971
Bitter rot	<i>Glomerella cingulata</i>	100	1,600	140	1,600	Clayton & Sutton, 1976a
Botryosphacteria rot	<i>Botryosphacteria ribis</i>	80 ⁴	1,600	140	1,600	Albert, 1974
Sooty blotch	<i>Gloeodes pomigena</i> ⁵	100 ⁵	2,500	225	2,500	Clayton & Sutton, 1976a
Fly speck	<i>Microthyriella rubi</i>	100 ⁵	2,500	225	2,500	Clayton & Sutton, 1976a
Brown rot	<i>Monillinia</i> sp.	50	253	25	253	Yoder, 1977

¹Based on losses on untreated trees in disease control experiments or observations in local areas.

²Acreages and affected production estimated from prevalence of diseases throughout eastern production regions.

³Severe infection one season may reduce yield for two seasons.

⁴Percent fruit loss. Also capable of producing cankers that kill trees.

⁵Percent fruit infected. Some superficially infected fruit may be salvaged for juice.

TABLE 6. ADVANTAGES OF EBDC FUNGICIDES ON APPLES (1)

Broad spectrum disease control

Well adapted, to integrated pest management programs

Good cost/benefit ratio

Fair to good effect on fruit finish

Compatible with spray oil

Combination labels with benomyl for control of resistant strains

Add flexibility to disease control programs

Beneficial physiological effects

(1) Based on surveys of eastern fruit pathologists and spray bulletins.

TABLE 7. DISADVANTAGES OF INDIVIDUAL ALTERNATIVE APPLE FUNGICIDES (1)

Benomyl

doesn't control rust diseases
not recommended for use alone because of potential for resistance
registration situation uncertain

Captafol

early season use for scab only
phytotoxicity
dermatitis effects

Captan

does not control rusts or powdery mildew
weak control of "summer diseases"
incompatible with spray oils and sulfur
cost increase predicted
registration situation uncertain
permits increase in mite populations

Dichlone

injurious to fruit and foliage
incompatible with spray oils

Dodine

controls scab only
resistant strains of V. inaequalis in several areas where scab is
the most important disease
reduced fruit quality of Golden Delicious

Perbam

phytotoxicity - severe russetting of Golden Delicious
black residue - should be used with spreader to avoid residue problem
supply for rust control uncertain
weak on scab control

Folpet

does not control rusts or powdery mildew
cannot be used in early and mid-season due to phytotoxicity
more expensive
registration situation uncertain
supply questionable

Thiram

generally weaker than EBDC's for control of most diseases
more expensive
supply for rust control questionable

(1) Based on surveys of eastern fruit pathologists and spray bulletins.

Cereal Crops Wheat, Barley, Oats, and Wildrice

The use and distribution of the EBDC fungicides on cereal crops is rather complex because of the movement of the chemicals across state borders, by both growers and distributors. There are two important uses of these fungicides on the cereal crops: 1) Seed treatment, 2) foliage protectant.

Regarding the plant diseases that involve the use of the EBDC fungicides, there are no known threshold levels that may be used to identify the potential crop loss that may be experienced prior to the time that disease control practices may be exercised. These fungicides are protectants; they do not erradicate a disease problem once it is started. In the case of cereal diseases controlled with the EBDC fungicides, the fungi which cause the ensuing disease are so influenced by the micro-environment that potential disease loss is difficult if not impossible to predict before the disease occurs.

Prior to the loss of the alkyl mercury seed treatment chemicals nearly all seed treating was done by commercial seed houses or elevator operators. Now most of the cereal crop seed treatment is done by growers on the farms. Where one commercial operator once treated seed for several hundred growers, now we have a situation where several hundred growers are individually treating their own seed. The on-the-farm equipment for seed treating does not do as efficient a job of treating as was done by the commercial equipment

1 previously referred to. In addition, the cost of all the extra
2 equipment has greatly increased the expense of the practice.

3
4 Seed treatment is the standard practice of using a fungicide
5 coating of the seed to protect the seed from invasion by fungi and
6 bacteria which results in damping off or seedling blight.

7
8 There are several fungicides currently registered for use as
9 seed treatment on the cereal grains, wheat, barley, and oats. The
10 most common of these chemicals include, maneb, mancozeb, captan,
11 Teracoat, thiram, Vitavax, and a combination of these materials.
12 Maneb is probably the fungicide used most for the protection of
13 external seedborne fungi and soil-borne fungi. Each of these
14 fungicides has specific uses, directly related to specific
15 microorganisms.

16
17 The use of EBDC fungicides as a seed treatment chemical on the
18 cereal grain crops (wheat, barley, and oats) is mostly confined to the
19 North Central States (Minnesota, North Dakota, South Dakota, and
20 Montana). As a seed treatment, the chemical is applied to the seed as
21 a dust, or slurry depending upon the available equipment. The chemi-
22 cal acts as a barrier or guard against invasion of the seed by soil-
23 borne and seed-borne fungi. These fungi may invade unprotected seed
24 prior to emergence. Seed treatment only protects the actual seed from
25 invasion. Once the seed has emerged, the plant is generally resistant
26 to these fungi. Therefore, seed treatment is very important in the
27 establishment of healthy stands of the cereal grains.

1
2 The types of fungicide used as seed treatment will vary through-
3 out the wheat growing areas depending upon the types of soil-borne and
4 seed-borne fungi present. In the winter wheat areas, namely Kansas,
5 Oklahoma, Missouri, and Nebraska, the nature of the fungus flora is
6 such that other fungicides such as Terra-coat[®], give better
7 protection. However, at this time this chemical is on the RPAR list
8 for review. In light of this fact, it hardly seems reasonable to
9 consider such a chemical as an alternative.

10
11 The spring wheat and Durum wheat growing areas, North Dakota,
12 South Dakota, Montana, and Minnesota account for 17,249,000 acres of
13 wheat, with an average yield of 28 bushels per acre.

14
15 The result of 10 years of field tests with the EBDC fungicides as
16 a seed treatment is 4.1 bushels per acre of increased yield. This 4.1
17 bushel yield increase resulted from an increased stand of 26.9%.
18 Approximately 1,700,000 acres of spring wheat and Durum wheat are
19 treated with an EBDC fungicide which at 4.1 bushels increase per acre,
20 represents 6,970,000 bushels of wheat currently produced by the wheat
21 farmers at no additional expense of energy.

22
23 In the winter wheat areas of Indiana and Kansas more than
24 1,028,000 acres of wheat are treated with EBDC seed treatments.

25
26 In the case of barley, 5,832,000 acres are grown in the North
27 Central states, Minnesota, North Dakota, South Dakota, and Montana.

1 In the North Central states, about 1.8 million acres are treated with
2 the various EBDC seed treatment fungicides. The 10 years of seed
3 treatment testing referred to above also included barley. The over
4 all average yield increase for the use of seed treatment was 4.1
5 bushels per acre. The same conditions and needs exist for the use of
6 seed treatment on the barley crop as was expressed for the wheat crop.

7
8 In general practice, most of the oat crop is not treated. This
9 condition relates to the cultural practices involving the growing of
10 oats, which for most growers is not a high value crop. In 1976 the
11 yield of the major oat variety (Froker) in southern Minnesota was
12 reduced by 30% from smut because it was not treated.

13 Historically the value of seed treatment with salt water was
14 discovered when wheat was traded and shipped in wooden ships. Salt
15 water leaking into the ship holds contaminated the wheat seed. If the
16 seed survived this treatment, when it was planted it did not develop
17 smut, a seed-borne disease. Seed treatment chemicals were tested and
18 methods of treatment were developed that provided a very inexpensive
19 and effective protection of the seed. The culminations of this work
20 was the use of the alkyl mercury fungicides, where 1/3 ounce of 3%
21 mercury would effectively treat one bushel of seed. With the loss of
22 registration for the mercury fungicide, we have resorted to using much
23 less effective chemicals at a greater grower cost and which are more
24 difficult to apply. This has resulted in the reduced use of seed
25 treating by growers, resulting in considerable loss of yield. In the
26 early 1960's in North Dakota, about 78% of the cereal grain seed for
27

1 sowing was treated. At present about 30% of the cereal crop is
2 treated. The overall effect has been to increase the cost of
3 production.

4 5 Application Techniques

6
7 Before the loss of the mercurial seed treatment fungicides, most
8 of the seed treatment was done at commercial seed houses with high
9 volume machines that measured and applied the chemical. The seed was
10 then hauled by truck to the field for planting. Prior to the use of
11 these techniques, seed was treated by hand, by the undivided grower,
12 usually resulting in poor or inadequate application. Today, because
13 of the loss of registration of the mercury chemical, about 60% of the
14 seed treating is again done on the farm, with various types of drill
15 box treating apparatus.

16
17 The EBDC fungicides are used throughout the world as a foliage
18 protectant fungicide on cereal grain crops. These fungicides are used
19 to protect cereal crops from diseases such as Leaf Rust, Septoria Leaf
20 Blotch, Net Blotch, Spot Blotch & Brown Spot. All of these plant
21 diseases attack and destroy the cereal plant leaves, causing major
22 crop losses. The practice of applying fungicides on a commercial
23 basis is relatively new, since 1962.

24 The acreage treated often depends upon the amount of crop value.
25 In 1975, Minnesota farmers treated about 1 million acres of cereal
26 crops. In 1976, more than 400,000 acres of winter wheat were treated
27

1 in Missouri. Results from 4 years of "on the farm" tests in North
2 Dakota showed an average 28% increased yield. See Tables 3,4,5,6, and
3 7 for yield response data relating to the value of Maneb-type fungi-
4 cides as a disease control practice.

5
6 The practice of applying fungicides to the cereal grain crops of
7 the United States is a new practice. The average increases in yields
8 are greater for fungicide protection than for the introduction of a
9 new variety. Increased yields reduce production and energy costs to
10 the grower. The EBDC fungicides are necessary for the production on
11 cereal crops. There are no alternative fungicides that can be used
12 for the protection of cereal grains from the various leaf spotting
13 plant diseases. Resistant crop varieties do not exist. This practice
14 is used in Brazil, Argentina, Isreal, and other near eastern countries
15 (Dr. J. Santiago, Cereal Pathologist, FAO).

16 The Use of Mancozeb on Wildrice

17
18 In Minnesota, paddy grown wildrice is subject to several leaf
19 spot diseases. The most important leaf spot disease caused by the
20 fungus Helminthosporium sativum, can completely destroy the crop in
21 some years.

22
23 Wildrice in most years has the potential of producing 1500 to
24 1800 pounds of rice per acre. The above leaf spot disease often
25 reduces such yield by 500 to 600 pounds per acre (Dr. M. F. Kernkamp,
26 Plant Pathologist, University of Minnesota).

1
2 The wildrice crop in Minnesota requires 4 applications of
3 fungicide to prevent the above losses. Minnesota may grow as much as
4 23,000 acres of paddy rice per year. Approximately one half of the
5 crop is treated each year.
6

7 In the 1977 growing season, 9354 acres of wildrice were treated
8 with EBDC fungicide to control the leaf spot diseases. Four applica-
9 tions were made, costing \$17.00 per acre for the season. Using a
10 minimum of 200 pounds per acre increase over untreated rice, results
11 in an increased income of \$183.00 per acre. The wildrice crop has an
12 income valued at harvest of \$1.00 to \$1.25 per pound. The final
13 retail value varies from \$3.50 to \$5.50 per pound.
14

15 In the case of wildrice, there are no alternative fungicides that
16 can be used to control these leaf spot disease.
17
18
19
20
21
22
23
24
25
26
27

TABLE 1

IDENTIFIED USE OF MANEB-TYPE FUNGICIDES
AS CEREAL GRAIN SEED TREATMENT

STATE	AMOUNT IN POUNDS	APPROXIMATE ACREAGE TREATED	PERCENTAGE OF CROP TREATED
Oklahoma	---	---	< 1%
Kansas	158,687	1,157,469	8.5%
Illinois	---	---	< 1%
Missouri	---	---	< 1%
North Dakota	426,150	2,894,800	---
Montana	150,000	1,200,000	---
South Dakota	30,000	240,000	---
Minnesota	150,000	1,200,000	---
Indiana	3,500	14,000	---
Misc.-States	50,000	200,000	---
TOTAL	954,000	6,892,269	---

Rate of application: 2 oz. per bushel of seed average planting rate-
1 bushel of seed per acre.

TABLE 2

BENEFIT^{1/} OF MANEB-TYPE SEED TREATMENT
IN THE NORTH CENTRAL STATE

STATE	YEAR	CROP	TREATED STAND YIELD ^{2/}		UNTREATED STAND YIELD	
Montana	'76	S.W.	233	34.6	166	32.0
North Dakota	'76	S.W.	222	23.4	151	22.2
Montana	'76	W.W.	516	30.3	388	25.2
Minnesota	'76	S.W.	291	43.5	267	42.2
South Dakota	'74	S.W.	294	17.5	205	15.0
South Dakota	'74	W.W.	172	22.6	149	19.8
Minnesota	'73	S.W.	248	62.0	161	57.0
North Dakota	'73	Bar.	-	51.2	-	48.5
North Dakota	'67	S.W.	-	25.2	-	21.0

TEN YEAR AVERAGE -	26% increase in stand 4.1 bushels/acre
--------------------	---

^{1/}Selected examples from 10 years of "on the farm" test.

^{2/}Yield in bushels per acre.

TABLE 3

Yields of spring wheat treated^{1/} by aerial application of fungicides to control cereal leaf diseases

Variety		Bushels/acres Treated	Bushels/acres Untreated	Yield inc
1962	Selkirk a)	35.9	31.9	4.0
	b)			
1963	Selkirk	25.8	18.3	7.5

^{1/}Fungicide treatment - 2 pounds/a zineb in 5 gallons of water.

TABLE 4

1965 - Average yields* of spring and Durum wheat from 3000 acres of leafspot disease control test fields, throughout the State of North Dakota

Variety	Treated ^{1/}		Untreated		Increased bu/a
	bu/a	Test wt.	bu/a	Test wt.	
Selkirk (spring)	32.9	56	26.7	56	6.2
Range of yield	26 to 47		16 to 35		
Justin (spring)	29.4	57	25.5	57	3.9
Range of yield	22 to 42		18 to 30		
Wells (Durum)	39.8	58	33.4	57	3.4
Range of yield	23 to 48		19 to 46		

*Date from field tests - 1/2 treated and 1/2 untreated, minimum size 20 acres.

^{1/}Fungicide treatment - 2 pounds/a zineb in 5 gallons water, applied by aircraft.

TABLE 5

CEREAL LEAF DISEASE CONTROL EXPERIMENTS, CARRINGTON, NORTH
DAKOTA EXPERIMENT STATION 1967

Variety		bu/a ^{1/}	Test Wheat
Chris	Untreated	50.9	60.0
	2 applications ^{2/}	54.8	60.8
	3 applications	56.5	60.0
Spring Wheat			
Selkirk	Untreated	48.1	58.5
	2 applications	61.8	59.5
	3 applications	63.7	58.8

^{1/} Average yeild 3 replication, significant 5% level

^{2/} Treatment 1½ pounds of Dithane M-45 plus spreader sticker

TABLE 6

1969 - Yield of spring wheat treated ^{1/} with
fungicide to control leaf disease in Minnesota

Variety	Treated		Untreated		Yield bu/a Increased
	bu/a	T/wt	bu/a	T/wt	
ERA	38.0	58.5	29.1	57.3	8.9

^{1/} Fungicide treatment - 2 pounds/a Dithane M-45.

TABLE 7

1970 - Yield of Winter Wheat Treated^{1/} with Fungicide
to Control Leaf Disease in Nebraska

Variety	Treated		Untreated		Yield bu/a Increase
	bu/a	Test wt.	bu/a	Test wt.	
Lancer	71.4	57	60.1	57	11.3
Warrior	71.0	58	63.3	58	7.7

^{1/}Fungicide treatment - 2 pounds/a Manzate 200.

ORNAMENTALS.

The Ornamental Industry

The "ornamental" or "environmental" plants industry is an extremely fragmented and complex section of agriculture. To correctly assess the benefits of the EBDC fungicides, one must attempt to integrate this fragmentation into some sort of an overall framework of industry areas. Flower crops that are produced commercially comprise one such area. These include crops grown in beds for cut flowers (roses, chrysanthemums, carnation, etc.) as well as those grown in pots and sold as complete flowering plants (poinsettias, Easter lilies, etc.). The crops are now grown mainly in greenhouses. In the South they are grown outdoors, perhaps under saran cloth or slatted coverings to protect them slightly from cold or sun.

Two other areas of the ornamental plants industry fall under this "flower crop" area. The production of bedding plants involves many types of flower crops started from seed, transplanted into flats or very small pots, and sold to home gardeners and landscapers for further transplanting into flower beds. Petunias, marigolds, pansies, etc., are common examples. Although they rarely flower, indoor green plants or "tropical foliage plants" are included in the "flower crop" area of the ornamental plants industry as well. This rapidly growing industry includes hundreds of plant types used as large specimen

1 plants for interior landscapes as well as small potted plants for
2 bedside or tableuses.

3
4 It is possible to identify another area of the ornamental plants
5 industry by considering the cold hardy plant material grown for use
6 in the outdoor landscapes of the northern United States. Crops grown
7 for these uses include the herbaceous perennials such as peonies, some
8 ferns, some chrysanthemums, etc. The woody trees and shrubs are the
9 crops most commonly thought of when considering this segment of the
10 industry. The plant diversity here is enormous, including hundreds of
11 different flowering and shade trees, evergreen trees and shrubs,
12 deciduous shrubs, and groundcovers.

13
14 One final area that falls within the overall ornamentals picture
15 is that dealing with the use and maintenance of these plants. It is
16 difficult to ascertain the size of these areas of our industry. It
17 would doubtlessly be extremely large! Landscapers, grounds keepers,
18 and homeowners often have a different view toward management of pests
19 than production segments of the industry. Pest control is a very
20 individualized matter. Within any one landscaper's clientele, there
21 exist persons who insist on adequate prevention of disease and persons
22 who easily tolerate disease occurrence.

23 General Nature of EBDC Uses

24
25 A detailed analysis of the impact of each EBDC ornamental plant
26 registration and use on each of these industry segments will not be
27 attempted in this analysis. To do so would be to get quickly bogged

1 down into minor details because of the multi-faceted nature of the
2 ornamental plant industries as was pointed out above. The literature
3 used to document disease occurrence and EBDC uses on ornamental plants
4 is cited at the end of this section. Specific reference to the
5 literature at each appropriate place in this discussion will not be
6 attempted. There is a long and diverse use history of EBEC fungicides
7 in the ornamental plant industries. Many of the recommended uses were
8 substantiated from efficacy research and uses first developed for
9 fruit and vegetable problems. The similarity of many ornamental
10 diseases to those found on fruit and vegetable crops has provided
11 needed sources of information for the ornamentalist for many years.

12
13 Table 1 lists the registered uses for EBDC fungicides on orna-
14 mental plants. Amobam, nabam, and metiram have few or no ornamentals
15 uses registered. In addition, use of these products appears to be
16 practically nil in the industry at this time. Mancozeb is registered
17 for use on 21 hosts for at least 26 diseases. Maneb is registered on
18 16 hosts for at least 35 diseases. Zineb is registered on 21 hosts
19 for at least 69 diseases. Zineb appears to be the material most
20 broadly registered and labeled for use by all segments of the
21 industry.

22
23 A most significant part of the EBDC fungicide use picture in
24 ornamentals is that they can be used to counter the myriad of severe
25 but minor or sporadic disease problems that may come up in a nursery,
26 greenhouse, or ornamental planting. As has been pointed out in
27 earlier sections of this analysis, the EBDC's are relatively

1 non-phytotoxic, are broad spectrum, are readily available, and are not
2 expensive. Thus, they become the material of choice when an orna-
3 mentalist encounters a disease problem. Extension service state
4 specialists have recognized this fact over the years when dealing with
5 protecting an industry from hundreds of diseases on hundreds of plant
6 types. State registrations have been developed to bring some of
7 these most essential uses properly onto labels. Table 2 is an example
8 of uses found on a Manzate 200 label developed for the State of
9 Florida by DuPont. Thus, an analysis of the uses of EBDC fungicides
10 on ornamentals must go beyond the Federal registration lists.

11
12 It is impossible to list all the EBDC uses in ornamentals; how-
13 ever some of the common flower crop and woody ornamentals uses are
14 listed in Tables 3 and 4. Because of the high value of ornamental
15 crops and plantings, it is difficult to rank the uses as to importance.
16 All diseases on ornamentals can be serious wherever and whenever they
17 occur, especially in production programs. For instance, mancozeb is
18 used by many rose growers for seven different diseases (Table 4).
19 Black spot is a common and serious disease. For this reason, mancozeb
20 as well as 20 alternative fungicides are registered for control of
21 black spot on roses. On the other hand, downy mildew is one of the
22 most serious diseases a greenhouse rose grower may encounter. It is
23 not common, however, so only zineb and two copper fungicides are
24 registered for use. Clearly, the benefit of the EBDC labels on roses
25 rests as much on the zineb for downy mildew label as on the mancozeb
26 for black spot label!
27

Major EBDC Uses

Rust diseases are common on many ornamental crops. They can occur anywhere in the nation, but most commonly are found on the West Coast. EBDC fungicides have been used for many years to combat most of these diseases (Table 5). Zineb is the most widely used, but mancozeb is becoming more and more popular. As can be seen from the table, additional labelling needs to be done to get complete coverage of these uses in all states. Anthracnose on shade trees (ash, maples, oaks, sycamores) can be serious in the northeast and north central United States. Preventive spraying of landscape trees is not widely done, however, unless a cool, wet spring occurs (one out of every 4 or 5 years in Ohio). Cedar apple rust is quite serious each year on certain crabapple cultivars in the northern Plains States. Alternaria leaf blight and Fusarium stem rot are common on greenhouse grown carnations in the northern states when the summer is hot. Rose rust is widespread on the West Coast during cool, rainy weather.

We do not have reliable information as to the extent of EBDC usage for these diseases, however. The reasons for this are the diverse nature of the ornamentals industry (as noted earlier), the tendency to use EBDC's for diseases not specifically labeled, and the many products on the market containing one of the EBDC fungicides. For instance, of 354 zineb products currently registered, 58 contain general recommendations for roses on the label (Table 6). It is uncertain how many actually contain specific recommendations for rose rust on the label. A survey of zineb products sold in Ohio revealed

1 that even the listing of ornamental crops on various labels was not
2 consistent (Table 7). Thus, one cannot obtain data on the extent of
3 usage by an analysis of existing products sales or distribution. The
4 overall benefit of EBDC fungicides in ornamentals is their widespread
5 usefulness on many diseases and the fact that alternative materials
6 are generally not as effective, are themselves subject to RPAR's, are
7 more phytotoxic, are not as widely available, or are more expensive.
8

9 There are, however, some rather large volume uses that do bear
10 analysis. EBDC's are used to combat several diseases on flower and
11 foliage crop in the southern states. The warm, humid climate plus
12 outdoor growing guarantee total losses due to disease without pro-
13 tective fungicides.

14
15 Mancozeb is currently the material of choice to protect
16 chrysanthemums from Septoria leaf spot, Botrytis, and Ascochyta blight
17 in Florida. Growers there are fortunate to have a label that allows
18 such use in that State (Table 2). On the average across the State,
19 protective fungicides are applied weekly to the mum crop being grown
20 for flowers. Mancozeb would be applied every other week, with either
21 benomyl or chlorothalonil sprayed on alternate weeks to give suf-
22 ficient control. Two hundred gallons of spray are used per acre for a
23 total of 78 pounds of mancozeb (80 WP) applied per acre over a year's
24 time (1-1/2 lb mancozeb/100 gal X 2 X 26 applications). Specialists in
25 Florida have estimated current mum production at 900 acres. There-
26 fore, this mancozeb use amounts to about 70,000 lb of mancozeb as 80
27 WP fungicide.

1 Added to this chrysanthemum use would be that used on mums being
2 grown for stock. Cuttings are harvested from stock crops in Florida
3 that provide plant material for practically all the growers throughout
4 the United States. Of course, a more intensive disease protection
5 program is practiced here. About 70 mancozeb applications per year
6 are applied over 130 acres of production for a yearly use total of
7 31,000 lb. Thus, we have a total use picture of mancozeb on mums in
8 Florida of about 100,000 lb.

9
10 Chlorothalonil and benomyl are alternative fungicides that could
11 be used. The primary limiting factor is cost. Chlorothalonil costs
12 about 3 times more than mancozeb use and benomyl is about 4 times more
13 expensive. Furthermore, there are phytotoxicity problems with chloro-
14 thalonil, especially on the flowers. Finally, it is believed that too
15 much dependency upon benomyl could lead to resistance of the pathogen
16 to that fungicide.

17
18 There are 8,100 acres of gladiolus commercially grown outdoors
19 in Florida. For protection against Botrytis and Curvularia blights,
20 mancozeb is sprayed every other week to protect the crop. Again,
21 figuring 3 lb/acre/application, this use would account for 631,000 lbs
22 of mancozeb 80 WP. Benomyl, some coppers, and ferbam are alternatives
23 but are not widely used. Benomyl is too expensive and might lead to
24 resistance. Ferbam is not widely available and leaves an unsightly
25 residue. The coppers can cause plant injury and also leave residues
26 that would make sale of the crop difficult.
27

1 The tropical foliage plant industry in Florida has grown rapidly
2 in recent years and is now estimated at \$250 million wholesale value,
3 with 75,000 acres in production. Growers utilize chlorothalonil,
4 benomyl, and mancozeb for control of foliar fungal pathogens. Surveys
5 designed to gather information on the total volume of materials used
6 are not yet completed. Mancozeb's wide spectrum of activity is useful
7 for combatting the 8-10 known foliar fungal diseases on each of the
8 over 300 plant types produced. Obviously, need for mancozeb goes far
9 beyond what is specifically outlined on the State label for Florida
10 (Table 2).

11
12 Foliage growers use mancozeb at 1 to 1-1/2 lb/100 gallons of
13 water. For greenhouse-grown foliage plants, spray applications are
14 made weekly during the warm and wet months (May to November) and every
15 1-2 weeks during the cooler, drier months. Where plants are grown out
16 of doors, the applications will be even more frequent. Although pre-
17 cise information is lacking, we estimate that most growers will apply
18 mancozeb about 20 times a year to most stock plants. For many of the
19 plants in finishing areas, mancozeb is used on a less frequent
20 schedule. As plants get closer to sale, sprays are usually
21 discontinued to reduce unsightly residue.

22
23 Mancozeb is essential on foliage plants because of broad spectrum
24 disease control, general lack of phytotoxicity, low cost, and wide
25 availability. Furthermore, it has been found that the combination of
26 mancozeb with copper hydroxide is the only spray that will provide
27 satisfactory protection against the several bacterial blights caused

1 by Xanthomonas. This spray combination is presently specifically
2 labelled for use on philodendron, but is widely needed on other plants
3 because of its essentiality.

4
5 Benomyl does not provide sufficient broad spectrum control for
6 general use on foliage plants and may lead to pathogen resistance.
7 Chlorothalonil has a wider control spectrum than benomyl but is
8 injurious to some plant species (most notably schefflera). Both of
9 these alternative fungicides are much more expensive than mancozeb and
10 are not as widely available. Although total mancozeb volume figures
11 are not known, it is clear that its use is extremely beneficial to
12 this large tropical foliage plant industry.

13 Alternative Fungicides in Ornamentals

14
15
16 Tables 3 and 4 list alternatives that are properly registered for
17 control of the noted diseases. A survey of growers and our review of
18 the limited sales information made available to us leads to the
19 conclusion that the various EBDC fungicides noted in Tables 3 and 4
20 are preferred to the alternatives in almost all instances. There are
21 serious negative properties possessed by the alternatives which make
22 most of them unsuitable, especially for repeated or routine use. As
23 pointed out earlier, ornamentalists require pesticides that give high
24 levels of disease control because of the high value and major invest-
25 ments required to produce these sorts of crops. Diseases can be
26 serious because they cause death of plants, may cause leafspots or
27 blights which detract from the beauty of the plant and thus lowers

1 market value. These indirect cosmetic losses are hard to document but
2 are very real in the eyes of an ornamental plant buyer or seller!
3 Along the same lines, many fungicides may themselves cause cosmetic
4 problems. Heavy residues, tissue burning, leaf curling, or other
5 phytotoxic results from fungicides cannot be tolerated in this indus-
6 try. This is especially true on those which are sold while flowering.
7 Finally, we must again consider that the usefulness of a fungicide on
8 ornamentals often rests in its broad spectrum of disease control on
9 many plant types; control of 1 or 2 diseases on 1 plant type is not of
10 much use to a nurseryman or ornamentalist who is responsible for pro-
11 tecting hundred of plant types against diseases in any one nursery or
12 greenhouse.

13 Chlorothalonil and benomyl, two commonly listed alternatives in
14 Tables 3 and 4, are generally considered to be more efficacious on the
15 diseases mentioned than the EBDC also noted. Why then are they not
16 chosen more often? Chlorothalonil has a very limited ornamentals
17 label. Although it is not generally injurious, chlorothalonil can
18 cause phytotoxicity on such plants as schefflera and chrysanthemums
19 (open flowers). Chlorothalonil is active on many more diseases than
20 those currently listed on the label. Thus, as the label is expanded,
21 more chlorothalonil doubtlessly will be used. Benomyl, on the other
22 hand, is widely labelled for use on many ornamental plants. Its use
23 record is practically free of phytotoxicity problems. Benomyl,
24 however, has a much more restrictive spectrum of control. Many EBDC
25 controled diseases, such as rusts or Alternaria blights or downy
26 mildews, cannot be controlled by benomyl. Further, fungi have a
27

1 tendency to develop resistance to benomyl. Finally, chlorothalonil
2 and benomyl are considerably more expensive than EBDC's. This expense
3 is a very real factor in the major volume uses discussed earlier. It
4 is probably of lesser concern than the performance factors mentioned
5 above, however.

6
7 Occasionally, captan, cycloheximide, folpet, and dodine are
8 listed as alternative fungicides. Captan and folpet are widely
9 available materials, especially for the yard and home garden market.
10 They are broad spectrum fungicides, but are more expensive and not
11 labelled for as many diseases as the EBDC's. There is no doubt they
12 would be used widely if EBDC uses were curtailed. However, the
13 future of captan and folpet is uncertain and labels are currently not
14 being expanded because both materials are RPAR candidates. Dodine is
15 a fungicide available to commercial users only. It is labelled for
16 use on fruit crops. Ornamental use occurs only where fruit tree
17 genera are sometimes used as ornamentals (peaches, cherries, pecans,
18 etc.). Cycloheximide is primarily labelled and marketed as a turf
19 fungicide, with a very few ornamentals uses on the labels of some
20 cycloheximide products. It is not widely sold for use on ornamentals,
21 mainly due to phytotoxicity problems.

22 Ziram, thiram, and ferbam are dithiocarbamate fungicides men-
23 tioned as alternatives in many cases. Although their degree of effec-
24 tiveness is not generally as great as the EBDC's and they are apt to
25 be more phytotoxic, more use would be made of these materials if the
26 need arose. They are currently so overshadowed by the EBDC's that
27

1 they are not being produced in great quantities and are rarely
2 available to ornamentalists. In addition, it should be mentioned that
3 ferbam leaves an unsightly, intolerable residue on plant material. It
4 certainly could not be used on any flowering or foliage crop near
5 marketing time.

6
7 There are several fixed copper fungicides that are registered for
8 many of the diseases listed in Tables 3 and 4. Copper oxychloride,
9 copper quinolinolate, COCS (copper oxychloride sulfate), bordeaux,
10 basic copper sulfate, and copper oleate (for homeowner use only) are
11 mentioned most often. As with fruits and vegetables, the copper
12 fungicides were widely used on ornamentals from the early 1900's to
13 the 1950's when the EBDC's and other organic fungicides were de-
14 veloped. Growers rapidly shifted away from use of copper because of
15 the tendency of coppers to injure plant tissue, especially in cool,
16 overcast, humid weather. In addition, coppers leave a terrible
17 residue on leaves and do not provide the level of disease control
18 achieved with EBDC's. Coppers must still be used on some ornamentals
19 because there is nothing else that provides better protection against
20 bacterial blights caused by Xanthomonas. As was mentioned earlier,
21 the combination of copper fungicide with mancozeb is a very essential
22 use on foliage crops for this reason. However, of all the alterna-
23 tives listed in Tables 3 and 4, the coppers would probably rank among
24 the least desirable. Many of them are not widely available. The
25 ornamentals registrations were achieved many years ago, often under
26 "me, too" type situations. Thus, efficacy would need to be completely
27 reviewed before they could be widely recommended. They are not

1 patented materials and it is doubtful that companies would develop a
2 minor crop ornamentals label even if the need were there.

3
4 Sulfur is another old fungicide which is labelled for many of the
5 diseases mentioned. As with the coppers, practically no sulfur is
6 used on ornamentals at this time. The fungicide is generally phyto-
7 toxic if used when the weather is hot and dry. It leaves a noticable
8 residue, and the efficacy of sulfur for control of many of the listed
9 diseases would be marginal.

10
11 Three commonly mentioned alternative fungicides are undergoing
12 the RPAR process or pre-RPAR reviews. These are benomyl, captan, and
13 folpet. The essentiality of affected EBDC uses on ornamentals thus
14 depends upon the outcome of these reviews. Of course, we cannot
15 comment in depth because the review processes are not finished.
16 However, the fact that these materials are being reviewed does
17 emphasize the importance of maintaining the EBDC use.

18
19 What is the overall usefulness of the "alternatives" to combat
20 the ornamentals diseases for which EBDC's are currently being used?
21 An examination of many state bulletins produced a list of 283 diseases
22 on 93 ornamental plant hosts. The list is not presented here because
23 it would introduce too much detail. The alarming result of such an
24 analysis is that if ferbam, coppers, and sulfur are discounted as
25 undesirable alternatives, 80% of the EBDC uses would have no other
26 alternative (Table 8). Another 8% would be added if we assume RPAR's
27 or pre-RPAR review materials are lost. Those that do "survive" this

1
2 realistic alternative appraisal are listed in Table 9. As was already
3 discussed, many of the alternatives in Table 9 have only a few
4 ornamentals uses on the label (dichloran, dodine, glyodin, oxycar-
5 boxin, etc.), have phytotoxicity problems (chlorothalonil,
6 cycloheximide, etc.) or are not widely available (ziram, tributyl tin
7 chloride, etc.). This brings to light the serious upheaval in the
8 existing technology of chemical disease control on ornamental plants
9 if the uses of EBDC fungicides were lost. Table 10 lists plant types
10 for which no adequate fungicide would be available for use, making the
11 same alternatives analysis as before. Such a situation is a serious
12 threat to the survival of all segments of the ornamentals plant
13 industry in the United States.

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3. Fungicide and Nematicide Tests. The American Phytopathological Society, St. Paul, Minnesota. The following reports from 1971 through 1977 give comparative efficacy and phytotoxicity of EBDC's and other fungicides for the diseases mentioned:

Volume 32 (1977)

- pp. 134-135 - Hawthorn and crabapple, rust
- p. 136 - Dogwood, Septoria leaf spot
- p. 140 - Roses, rust
- p. 143 - Viburnum, downy mildew
- p. 144 - Zinnia, Alternaria blight
- p. 145 - Maple, leaf spot

Volume 31 (1976)

- p. 134 - Azalea, flower blight
- p. 134 - Dogwood, Septoria leaf spot
- p. 135 - Fuchsia, rust
- pp. 135-136 - Geranium, rust
- p. 136 - Hawthorn, leaf spot
- p. 136-137 - Viburnum, leaf spot
- p. 144 - Hawthorn, rust

Volume 30 (1975)

- p. 115 - Rose, black spot

Volume 29 (1974)

- p. 103 - Chrysanthemum, flower blight complex
- p. 104-105 - Geraniums, rust
- p. 105 - Gladiolus, corm rots
- p. 107 - Rose, black spot
- p. 110 - Rose, rust
- pp. 110-111 - Snapdragon, rust
- p. 111 - Statice, anthracnose
- pp. 111-112 - Statice, Cercospora leaf spot
- p. 121 - Azalea, flower blight
- p. 124 - Poplar, cutting bed cankers

Volume 28 (1973)

- pp. 109-110 - Chrysanthemum, Ascochyta blight
- p. 113 - Narcissus, leaf scorch and red blotch
- p. 116 - Rose, rust
- p. 117 - Rose, blackspot
- p. 126 - Crabapple, rust
- p. 126 - Hawthorn, rust
- p. 127 - Firethorn, scab
- p. 128 - Radiata pine, terminal crook
- pp. 129-130 - Scotch pine, needlecast

Volume 27 (1972)

- pp. 121-122-123 - Chrysanthemum, Ascochyta blight
p. 125 - Narcissus, leaf scorch and red blotch
p. 127 - Rose, black spot
p. 131 - Rose, rust
p. 137 - Radiata pine, pine needle blight

Volume 26 (1971)

- p. 112 - Carnation, leaf spot
p. 112 - Chrysanthemum, Ascochyta blight
p. 113 - Dogwood, leaf blight
p. 115 - Laurel, leaf spot
p. 116 - Azalea, flower blight
p. 118 - Rose, rust

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Table 1. EBDC Registrations on Ornamentals

1. Diammonium EBDC (Amobam) - none

2. Disodium EBDC (Nabam) -

- A. Azalea - petal blight (Ovulinia)
- B. Camellia - petal blight (Sclerotinia)
- C. Carnation - anthracnose, leaf spots, rust
- D. Chrysanthemum - anthracnose, leaf spots, rust
- E. Snapdragon - anthracnose, leaf spots, rust
- F. Roses - black spot, powdery mildew

3. Mancozeb -

- A. Azalea - petal blight
- B. Camellia - petal blight
- C. Carnation - leaf spot
- D. Chrysanthemum - Botrytis blossom blight
- E. Crabapples - Cedar apple rust, scab
- F. Dahlias - Botrytis blight
- G. Dogwood - Anthracnose
- H. Gladiolus - Botrytis and Curvularia flower and leaf spots
- I. Holly - Purple spot
- J. Hollyhock - anthracnose, leaf spot, rust
- K. Honeysuckle - Herpobasidium blight
- L. Iris - Didymellina leaf spot
- M. Lily - Botrytis blight
- N. Mistletoe - mold
- O. Pachysandra - Volutella leaf and stem blight
- P. Pansies - anthracnose
- Q. Peony - Botrytis and Phytophthora blights
- R. Rhododendron - petal blights
- S. Roses - black spot
- T. Snapdragon - rust
- U. Tulips - Botrytis blight
- V. Zinnia - leaf blight

4. Manganese EBDC (Maneb)

- A. Asters - rust, stem rot
- B. Azaleas - petal blights
- C. Camellias - petal blights
- D. Carnations - Alternaria blight, anthracnose, Botrytis blight
- E. Chrysanthemums - Ascochyta blight, Botrytis petal spot, Septoria leaf spot
- F. Dahlias - Alternaria blight, Botrytis blight
- G. Dogwood - Anthracnose
- H. Geraniums - Botrytis blight
- I. Gladiolus - Botrytis blight, Curvularia and Stemphylium leaf spots
- J. Hydrangeas - Botrytis blight
- K. Iris - Alternaria blight or leaf spot, Botrytis blight
- L. Lilies - Botrytis blight
- M. Pansies - Alternaria blight or leaf spot, anthracnose, Botrytis blight
- N. Peonies - Alternaria blight or leaf spot, Botrytis blight, Phytophthora blight
- O. Roses - Black spot, Cercospora leaf spot (Texas), rust (California)
- P. Snapdragons - Botrytis blight, downy mildew, rust
- Q. Zinnias - Alternaria blight, Botrytis blight

Table 1 continued

5. Zinc EBDC (Zineb) -

- A. Aster - Botrytis flower blight and stem rot, downy and powdery mildew, leaf spots, rust
- B. Azalea - galls, leaf spots, petal blight
- C. Camellia - petal blight
- D. Carnations - Alternaria blight, anthracnose, Botrytis blight, leaf spots, powdery mildew, Fusarium root rot
- E. Chrysanthemums - Anthracnose, Botrytis blight, leaf spot, rust, Ascochyta ray blight
- F. Cyclamen - Botrytis blight, leaf spot
- G. Dahlias - Botrytis blight, leaf spots, powdery mildew, stem rot, storage rots
- H. Delphinium - Botrytis blight, Cercospora and Septoria leaf spots, powdery mildew, rust, stem rot
- I. English ivy - leaf and stem spots, twig blight
- J. Gladiolus - Alternaria leaf blight, Botrytis gray mold, Curvularia leaf spot, Stemphylium leaf spot
- K. Geraniums - Botrytis gray mold, leaf spot, powdery mildew
- L. Hollyhocks - anthracnose, leaf spots, rust
- M. Hydrangea - Botrytis, leaf spots, powdery mildew rust
- N. Iris - Botrytis leaf blight, Alternaria leaf spot, rust
- O. Lilies - Botrytis gray mold
- P. Pansies - Anthracnose, leaf spot
- Q. Peonies - flower blight
- R. Roses - black spot, Botrytis gray mold, downy and powdery mildews, leaf spots, rust
- S. Snapdragons - anthracnose, Botrytis blight, leaf spots, powdery mildew, rust
- T. Tulips - Botrytis blight
- U. Zinnias - leaf spots

5. Metiram (Polyram)

- A. Roses - black spot

Table 2. Manzate 200 fungicide uses on ornamentals found on a state label for Florida (EPA SLN NO. FL-770008).

<u>Crop</u>	<u>Diseases</u>
Azalea	Cylindrocladium rot Phytophthora, spp
Arborvitae	Cercospora blight
Cedar, Red	Cercospora blight Phomopsis blight
Chrysanthemum	Aschochyta blight
Cordyline	Cercospora leafspot
Dieffenbachia	Leptosphaeria brown spot
Dracaena	Fusarium leafspot
Fern	Rhizoctonia blight
Ficus	Cercospora leafspot
Gladiolus	Botrytis rot Curvularia rot
Juniper	Phomopsis blight
Ligustrum	Cercospora leafspot
Peperomia	Cercospora leafspot
Philodendron	Dactylaria leafspot Phytophthora leafspot
Pleomele	Fusarium leafspot
Schefflera	Alternaria blight
Statice	Cercospora frog-eye
Venus Flytrap	Anthraco-nose

TABLE 3. Common Diseases of Flower Crops in Which EBDC Fungicides*
Have Been Recommended for Control.

Crop	Maneb	EBDC Specifically Registered	Registered Alternatives
Aster	Rust	Yes	Ziram, Cu oxychloride
Chrysanthemum	Ascochyta	Yes	Chlorothalonil, Benomyl
	Botrytis Petal Spot	Yes	Captan, Benomyl, Chlorothalonil
Geranium	Rust	No	None
Rose	Black Spot	Yes	Many
Snapdragon	Rust	Yes	Ziram
<u>Zineb</u>			
Aster	Rust	Yes	Cu oxychloride, Ziram
Carnation	Alternaria Leaf Spot	Yes	Captan, Ferbam, Folpet
	and Branch Rot		Cu oxychloride, Copper quinolinolate
	Rust	No	Ziram, Captan, Cu oxychloride
	Greasy Blotch	No	None
Chrysanthemum	Ascochyta Blight	Yes	Chlorothalonil, Benomyl
	Rust	Yes	Ferbam, Sulfur, Cu oxychloride
	Botrytis Petal spot	Yes	Captan, Chlorothalonil, Benomyl
Celosia	Leaf Spots	No	Chlorothalonil (Termil, only)
Columbine	Rust	No	None
Dahlia	Botrytis Blight	Yes	Benomyl, Bordeaux, Ferbam, Basic CuSO ₄ , Dichloran, Thiram
Hollyhock	Rust	Yes	Lime Sulfur, Ferbam,
			Cu oxychloride
Hydrangea	Leaf Spots	Yes	Ferbam, Sulfur, Benomyl, Chlorothalonil (Termil, only)
Impatiens	Leaf Spots	No	Chlorothalonil (Termil, only), Benomyl
Lily	Botrytis Blight	Yes	Benomyl, Bordeaux, Basic CuSO ₄
Marigold	Leaf Spots	No	Chlorothalonil (Termil, only), Basic CuSO ₄
Nasturtium	Leaf Spots	No	Chlorothalonil (Termil, only), OCCS, Basic CuSO ₄
Pansy	Anthracnose	Yes	Cu oxychloride
	Leaf Spots	Yes	None
	Scab	No	None
	Botrytis Blight	Yes	Benomyl, Bordeaux, Cu oxychloride, Basic CuSO ₄ , Ferbam
	Leaf Spots	No	Cu oxychloride, Basic CuSO ₄
	Leaf Spots	No	Cu oxychloride, Basic CuSO ₄ , Sulfur
Rose	Black Spot	Yes	Many

(continued)

Table 3 (continued).

Crop	Zineb	EHDC Specifically Registered	Registered Alternatives
Snapdragon	Rust	Yes	Ziram, Cu oxychloride, Sulfur
	Anthracnose	Yes	Captan, Cu oxychloride, Ferbam, Folpet
	Downy Mildew	Yes	Cu oxychloride
Stock	Leaf Spots	No	Cu oxychloride, Basic CuSO ₄
Sweet Pea	Anthracnose	No	Cu oxychloride
	Leaf Spots	No	Basic CuSO ₄ , Ferbam
	<u>Mancozeb</u>		
Aster	Downy Mildew	No	None
	Alternaria Blight	No	Basic CuSO ₄
	Botrytis Blight	No	Chlorothalonil (Termil, only) Benomyl
Carnations	Alternaria Leaf Spots	Yes	Captan, Ferbam, Folpet, Cu oxychloride, Copper quinolate
Chrysanthemum	Ascochyta Blight	No	Chlorothalonil, Benomyl
	Botrytis Blight	Yes	Captan, Chlorothalonil, Benomyl
Dahlia	Botrytis Blight	Yes	Benomyl
Geranium	Botrytis Blight	No	Benomyl, Chlorothalonil
	Rust	No	None
Gardolus	Botrytis Blight	Yes	Benomyl
	Leaf Spots	Yes	Ferbam, Basic CuSO ₄ , Bordeaux
Hollyhock	Leaf Spots	Yes	Bordeaux, Cu oxychloride, Basic CuSO ₄ , Ferbam
	Rust	Yes	Lime Sulfur, Ferbam, Cu oxychloride
Lily	Botrytis Blight	Yes	Benomyl, Bordeaux, Basic CuSO ₄ , Ferbam, Cu oxychloride
	Botrytis Blight	No	Benomyl, Chlorithalonil (Termil)
Petunia	Botrytis Blight	No	Benomyl, Chlorithalonil (Termil)
Snapdragon	Rust	Yes	Ziram, Cu oxychloride, Sulfur
	Anthracnose	No	None
Statice	Botrytis Blight	Yes	Benomyl, Bordeaux, Basic CuSO ₄ , Thiram, Ferbam
Tulips	Botrytis Blight	Yes	Cu oxychloride, Folpet
Zinnia	Alternaria Blight	Yes	

*Based on references listed at the end of the narrative.

Table 4. Common Woody Ornamentals Diseases in Which EBDC Fungicides Have Been Recommended for Control*.

Crop	Mancozeb	EBDC Specifically Registered	Registered Alternative
European horse chestnut	Leaf Blotch Leaf Spot	No Yes	Lime sulphur (Dormant) Benomyl
Camellia	Flower Blight	Yes	Captan, Ferbam, PCNB
Hornbeam	Leaf Spots (v)	No	None
Hickory	Leaf Spot	Yes	None
Catalpa	Leaf Spot	No	None
Hackberry	Leaf Spot	No	None
Redbud	Leaf Spot	No	None
Fringetree	Leaf Spot	No	Benomyl, Basic CuSO ₄
Virgin's bower	Leaf Spot and Stem Rot	No	Sulphur, Benomyl
Dogwood	Leaf Spots	Yes	Bordeaux, Basic CuSO ₄ , Benomyl
Cotoneaster	Leaf Spot	No	Basic CuSO ₄ , Benomyl
Hawthorn	Leaf Blight	No	Actidione
	Rusts	No	Sulphur
	Scab	No	None
Bush honeysuckle	Leaf Spot	No	Basic CuSO ₄ , Benomyl
Eleagnus	Leaf Spot	No	None
Euonymus	Anthracnose	No	Benomyl, Lime sulphur (Dormant)
Beech	Leaf Spot	No	None
Persythia	Leaf Spot	No	Basic CuSO ₄
Franklinia	Leaf Spot	No	None
Coffee Tree	Leaf Spot	No	None
Witch Hazel	Leaf Spot	No	Basic CuSO ₄ , Benomyl
Winterberry	Tar Spots	No	None
	Leaf Spots	No	Basic CuSO ₄
Larch	Needle Rusts	No	Lime Sulphur (Dormant)
Privet	Leaf Spot	No	Basic CuSO ₄ , Bordeaux, Benomyl
Honeysuckle	Leaf Blight	Yes	None
Magnolia	Leaf Spot	No	PCNB
Flowering Crab	Rust	Yes	None
apple	Scab	Yes	Benomyl, Folpet
	Bitter Rot	Yes	Folpet
	Sooty Blotch	Yes	Folpet
Pachysandra	Twig Blight	Yes	None
terminalis			
Boston Ivy	Leaf Spot	No	Cu oxychloride, Bordeaux
Princess Tree	Leaf Spot	No	Benomyl, Lime Sulphur
Mock Orange	Leaf Spot	No	Basic CuSO ₄ , Benomyl
Cherry Laurel	Leaf Spot	No	Basic CuSO ₄ , Sulphur
Ornamental peach	Leaf Curl	Yes	Ziram, Ferbam, Lime Sulphur, Captan, Dodine, Coppers (Several)
Flowering Japanese	Witch's Broom	No	None
cherries			
Oak	Leaf Blister	No	Basic CuSO ₄
	Leaf Spot	No	Bordeaux
Azalea	Azalea Petal Blight	Yes	Benomyl, Ferbam, Ziram, Thiram, PCNB, Captan, Diclone
	Azalea Leaf Spot	Yes	Benomyl, Ferbam, Basic CuSO ₄

(continued)

1 Table 4 continued.

2	<u>Crop</u>	<u>Mancozeb</u>	<u>EBDC Specifically</u> <u>Registered</u>	<u>Registered Alternative</u>
3	Azalea (continued)	Dieback	No	None
		Leaf Spots	No	Bordeaux, Basic CuSO ₄ , Benomyl
4	Rose	Rhododendron Petal Blight	Yes	Benomyl
		Black Spot	Yes	Many
5		Leaf Spot	Yes	Coppers, Benomyl, Sulphur
		Brown Canker	No	Basic CuSO ₄ , Lime Sulphur, Sulphur
6		Brand Canker	No	None
		Common Stem Canker	No	None
7		Crown Canker	No	None
		Cane Blight Canker	No	None
8		Alternaria Leaf Spot	No	Copper Quinolinolate
		Downy Mildew	No	Basic CuSO ₄ , Cu oxychloride
9	Mountain Ash	Leaf Rusts	No	None
		Scab	No	None
10	Lilac	Phytophthora Blight	No	None
	Viburnum	Downy Mildew	No	None
11		<u>Maneb</u>		
12	Maples	Leaf Blister	No	None
	Camellia	Flower Blight	Yes	Captan, Ferbam, PCNB
	Dogwood	Leaf Spots	Yes	Bordeaux, Basic CuSO ₄ , Benomyl
13	Hazelnuts	Leaf Curl	No	Lime Sulphur (Dormant)
	Pinus	Needle Cast	Yes	Chlorothalonil
14	White Pine	Brown Spot	Yes	None
	Rose	Fusiform Rust	Yes	None
15		Black Spot	Yes	Many
		Leaf Spot	Yes	Coppers, Benomyl, Sulphur
16		Rust	Yes	Coppers, Ferbam, Actidione, Glyodin Sulphur
17		Cercospora Leaf Blight	Yes	None
18		<u>Zineb</u>		
19	Maples	Leaf Spot; Purple Eye	No	Bordeaux, Basic CuSO ₄
	European horse chestnut	Leaf Spot	Yes	Lime Sulphur (Dormant)
20	Amelanchier (serviceberry)	Rust	No	None
	Boxwood	Rusts	No	Lime Sulphur (Dormant)
21	Hickory	Leaf Spot	Yes	None
	Flowering Quince	Rust	Yes	None
22		Leaf Spots	Yes	Benomyl, Basic CuSO ₄
	Dogwood	Flower and Leaf Blight	Yes	Benomyl
		Leaf Spots	Yes	Benomyl, Basic CuSO ₄ , Bordeaux
23	Hawthorn	Leaf Blight	No	Actidione
		Rusts	No	None
24		Leaf Spot	Yes	None
	Euonymus	Leaf Spot	Yes	Benomyl, CuSO ₄

(continued)

1 Table 4 continued.

2	<u>Crop</u>	<u>Zineb</u>	<u>EBDC Specifically</u> <u>Registered</u>	<u>Registered Alternative</u>
3	Ash	Leaf Spot	No	None
	English Ivy	Stem Spot	Yes	None
4	Butternut	Twig Blight	Yes	None
		Brown Leaf Spot	No	None
	Japanese Walnut	Yellow Leaf Blotch	No	Benomyl, Dodine
5	Mountain laurel	Leaf Spot	No	Ferbam, Basic CuSO ₄ , Benomyl
		Blight	No	Bordeaux
6	Flowering crab-apple	Rust	Yes	None
		Frog-eye Leaf Spot	Yes	None
	White Pine	Southern Cane Rust	No	Ferbam
7	Oak	Anthracnose	Yes	Bordeaux, COCS, Benomyl, Lime
				Sulphur
8	Azalea	Azalea Petal Blight	Yes	Many
		Azalea Gall	Yes	Cu oxychloride
9		Leaf Scorch	Yes	Basic CuSO ₄
		Rust	No	None
		Azalea Leaf Spot	Yes	Ferbam, Benomyl, Coppers
10	Flowering Currant and gooseberries	Leaf Spots	Yes	Ferbam, Folpet, Benomyl, Captan
11	Rose	Botrytis Blight	Yes	Many
		Leaf Spot	Yes	Many
		Rust	Yes	Many
12		Downy Mildew	Yes	Basic CuSO ₄ , Cu oxychloride
	Willow	Gray Scab	No	None
13		Leaf Spot	No	None
	Lilac	Leaf Spot	Yes	Benomyl, Basic CuSO ₄ , Bordeaux
14	Hemlock	Blister Rust	No	None
		Needle Rust	No	Lime Sulphur (Dormant)
	Periwinkle	Blight	No	Benomyl
15	Pinus	Leaf Casts	No	None

16 * Based on references listed at the end of the narrative.

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TABLE 5. EBDC Fungicide Uses to Control Rusts on Ornamentals.*

<u>Plant</u>	<u>EBDC Specifically Registered</u>	<u>Alternatives</u>
Almond, Flowering	None	Ferbam
Ash	None	None
Aster	Mancozeb, Zineb	Sulfur
Azalea	None	Ferbam
Birch	None	None
Carnation	Nabam	Captan, Ferbam, Folpet, Oxycarboxin, Sulfur
		Cycloheximide
Cedar, Red	None	None
Cherry, Flowering	None	None
Cherry, Laurel	None	None
Cherry, Plum	None	None
Chrysanthemum	Nabam, Zineb	Ferbam, Sulfur
Crabapple	None	Sulfur
Delphinium	Zineb	None
Dieffenbachia	None	None
Fuchsia	None	None
Geranium	None	Ferbam
Hawthorn	None	Sulfur
Hollyhock	Mancozeb, Zineb	Sulfur
Hydrangea	Zineb	None
Lilac	Zineb	None
Juniper	None	Ferbam
Mayday Tree	None	None
Mountain Ash	None	None
Peach, Ornamental	None	None
Pear, Ornamental	None	None
Plum, Ornamental	None	None
Poplar	None	None
Quince	None	None
Rhododendron	None	None
Rose	Zineb	Ferbam, Sulfur, Cycloheximide
		Tributyltin Chloride
Service Berry	None	None
Snapdragon	Mancozeb, Maneb, Zineb	Ferbam, Sulfur, Folpet, Glyodin
Willow	None	None

*Based on references listed at the end of the narrative.

TABLE 6. Number of Products Containing EBDC Fungicide and Their Relationship to Rose Uses.*

	<u>Total Products</u>	<u>Total Registered on Roses</u>	<u>Total Combination Products Registered on Roses</u>
Amobam	2	0	0
Nabam	51	0	0
Mancozeb	110	18	5
Maneb	306	34	9
Zineb	354	58	34
Metiram (Polyram)	53	3	0

*Taken from EPA Label Microfiche File, 10/77.

TABLE 7. Labelled Ornamental Uses of Zineb Products Sold in Ohio.*

<u>Product</u>	<u>Package Size</u>	<u>Crops on Label</u>
FMC Zineb 72 WP	50 lb.	Azaleas, camellias, carnations, chrysanthemums, hollyhocks, snapdragons, gladiolus, roses, fruits, and vegetables.
E-Z Flo Vega-guard	50 lb.	Vegetables only.
Science Zineb	8 oz.	Azaleas, camellias, gladiolus, snapdragons, chrysanthemums, carnations, hollyhocks, roses.
Rockland Zineb	8 oz.	Asters, carnations, iris, pansy, zinnia, dahlia, hydrangea, peony, geranium, lily, snapdragon, gladiolus, tulips.
Tobacco States Zineb	1 lb.	Snapdragons, chrysanthemums, carnations, hollyhocks.
Acme Zineb	8 oz.	Same as Science Zineb.

*As determined from labels on file in the offices of the Plant Industry Division, Ohio Department of Agriculture.

Table 8. An analysis of fungicides that might serve as alternatives to 283 EBDC uses on 93 ornamental host plants.*

	<u>Number of Uses</u>	<u>% of Total</u>
1) Benomyl - Only alternative listed	15	5
One of alternatives	151	53
2) RPAR or pre-RPAR Materials -		
Only alternatives listed	22	8
3) Ferbam, coppers, or sulphur -		
Only alternatives listed	188	66
4) No alternatives listed	38	13
5) Total of Numbers 2, 3, 4	248	88

* Master list of hosts and diseases provided by Biochemicals Department, E. I. DuPont de Nemours and Co. (Inc.), Wilmington, Delaware, December, 1977. Alternatives derived from EPA Label Microfiche.

TABLE 9. EBDC ornamentals uses which have an alternative; excluding ferbam, coppers, sulfur, RPAR'd materials or pre-RPAR review materials.*

<u>Plant</u>	<u>Disease</u>	<u>Alternative</u>
African violet	Botrytis Blight	Chlorothalonil (Termil)
Begonia	Botrytis Blight	Chlorothalonil (Termil)
Camellia	Flower Blight	Ziram
Carnation	Rust	Oxycarboxin
	Botrytis	Chlorothalonil (Termil)
Chrysanthemum	Leaf Spots	Chlorothalonil, Ziram
	Ascochyta Ray Blight	Chlorothalonil
	Botrytis Blight	Chlorothalonil, Dichloran
Geranium	Botrytis Blight	Chlorothalonil, Dichloran
Gladiolus	Botrytis Leaf Spot	Ziram, Dichloran
	Corn Decay	Thiram
Iris	Leaf Spots	Chlorothalonil
Lily	Gray Mold (Botrytis)	Chlorothalonil
	Bulb Rot	Thiram
Petunia	Botrytis Blight	Chlorothalonil (Termil)
Rose	Diplocarpon Black Spot	Chlorothalonil, Dodine, Lime Sulfur, Glyodin, Tributyltin Chloride, Anilazine, Ziram
	Rust	Cycloheximide, Glyodin, Tributyltin Chloride
	Leaf Spots	Chlorothalonil, Cycloheximide
Snapdragon	Botrytis Gray Mold	Chlorothalonil
Tulip	Bulb Decay	Thiram
Azalea	Ovulinia Petal Blight	Thiram
Conifers	Lophodermium Needle Cast	Chlorothalonil
Hawthorn	Leaf Blight	Cycloheximide
	Leaf Spots	Cycloheximide
Hydrangea	Botrytis Bud Blight	Dichloran, Chlorothalonil (Termil)
Juniper	Rust	Cycloheximide
Pecan, Ornamental	Scab	Dodine, Triphenyltin
	Leaf Spots	Dodine, Triphenyltin
	Powdery Mildew	Triphenyltin, Dodine
	Leaf Blotch and Scorch	Dodine, Triphenyltin
	Anthracnose	Dodine, Triphenyltin
	Spot Anthracnose	Dodine, Triphenyltin
Pine	Scirrhia (Brown Spot)	Chlorothalonil
	(Needle Blight)	
	Lophodermium Needle Cast	Chlorothalonil
Rhododendron	Leaf Spots	Ferbam, Ziram
Sycamore	Anthracnose	Dodine
Walnut	Anthracnose	Chlorothalonil, Dodine, Thiram
	Leaf Spots	Dodine
	Yellow Leaf Blotch	Dodine
	Blights	Dodine

*See Table 8 for sources of information.

Table 10. Ornamental plants for which no fungicides would be available for foliar disease control if EBDC's were lost and coppers, ferbam, sulphur, RPAR'd and pre-RPAR review chemicals were not available.*

Plant	Number of Diseases Involving EBDC Uses
Almond, Flowering	5
Amaryllis	3
Ash	3
Aster	4
Aucuba	1
Barberry	1
Birch	2
Boxelder	6
Boxwood	3
Buckeye	3
Butternut	3
Buttonwood	3
Caladium	2
Cedar-red	1
Cherry, Flowering	6
Cherry Laurel	5
Clematis	1
Cotoneaster	1
Crabapple	5
Currant (Alpine)	2
Cyclamen	2
Daffodil	2
Dahlia	3
Daisy (Shasta)	2
Dieffenbachia	1
Dogwood	5
Elm	4
Euonymus	2
Fir	3
Forsythia	1
Fuchsia	1
Gardenia	1
Hickory	4
Holly	6
Hollyhock	3
Honey Locust	2
Honeysuckle	1
Horsechestnut	3
Hyacinth	2
Ivy	3
Kinnikinnik (Arctostaphylos)	1
Linden	1
Maple	6
Mayday Tree	5
Mimosa	1
Mountain Ash	4
Mulberry	1
Narcissus	3
Oak	4

(continued)

Table 10 continued.

<u>Plant</u>	<u>Number of Diseases Involving EBDC Uses</u>
Peach, Ornamental	5
Pear, Ornamental	3
Pachysandra	3
Pansy	4
Peony	4
Philodendron	1
Photinia	1
Plum, Ornamental	5
Poplar	2
Privet	1
Pyracantha	1
Quince	3
Redbud	2
Service Berry	1
Shrubs	1
Snowball	2
Spiraea	1
Sumac	1
Violet	1
Virginia Creeper	1
Willow	6
Zinnia	2

See Table 8 for sources of information.

Turfgrass

Further information on fungicide efficacy and alternatives may be obtained from American Phytopathological Society, Fungicide, and Nematicide Test Reports, Volumes 26-32, turfgrass fungicide sections.

Uses

Turfgrasses have become the major ground cover plant for most of the suburban and urban United States. Home grounds, school grounds, parks, golf courses, athletic fields, and institutional and industrial grounds all utilize turfgrasses for erosion control, playing surfaces and aesthetic improvement. For most purposes the desired end result is a uniform living green carpet. Standards of quality have been constantly rising for all turfgrass purposes with home lawns, athletic fields and golf courses receiving special emphasis (15).

The importance of disease control in turfgrass culture has increased concurrently with the rising quality standards. Intense usage of these turf areas due to the leisure time recreation explosion has necessitated comprehensive disease control practices which include fungicide treatment. For example, it is estimated that there are in excess of 14,000 golf courses in the United States. The States of Ohio and Pennsylvania each has in excess of 600 courses. Fungicides are used on tees, greens, and fairways for control of fungus induced diseases.

1 In a similar manner athletic fields and home lawns are receiving
2 the brunt of the outdoor recreation boom. Disease control is an
3 essential part of the quality maintenance program for most athletic
4 fields and many home lawns.

5
6 Important diseases of turfgrass include those caused by the
7 Helminthosporium species. These fungi are responsible for leaf
8 lesions (spots and blighting), crown rots, and root rots. Various
9 names have been given to these diseases such as Melting out, Leaf
10 spot, and Helminthosporium leaf spot. Almost every turfgrass species
11 is attacked, including Kentucky bluegrass (Poa pratensis), annual
12 bluegrass (Poa annua), fescues (Festuca sp.), bentgrasses (Agrostis
13 sp.), rye grasses (Lolium perenne), Bermuda grass (Cynodon sp.), and
14 Zoysia (Zoysia sp.). The Helminthosporia are major pathogens for most
15 of these grass species throughout the United States (10).

16
17 The Rhizoctonia fungi also incite foliar blighting and crown rots
18 of most of the above grasses. Popularly known as Brown patch or
19 Rhizoctonia brown patch these diseases are especially severe under the
20 humid conditions of the southeast, east, and midwestern United States
21 (10).

22 Pythium fungi attack seedling turfgrasses as well as established
23 plantings. Bentgrasses and rye grasses are especially susceptible.
24 In addition to foliar blighting, crowns, roots, and stolons may be
25 killed. Pythium blight is known to turfgrass managers as cottony
26 blight, grease spot, and Pythium. It is perhaps the most severe of
27

1 all turfgrass diseases resulting in death of large areas of grass when
2 environmental conditions are favorable for disease spread. Pythium
3 blight is a severe problem in the southern, Mid-Atlantic and
4 midwestern areas of the United States (10).

5
6 Maneb, mancozeb, and a lesser amount of zineb are among the major
7 fungicides used throughout the United States for control of the
8 Helminthosporium pathogen. Smaller amounts are used for Rhizoctonia
9 and Pythium diseases. It is estimated that 650,000 lb. of these
10 materials are used in the United States primarily for these three
11 disease groups. The largest single use is estimated to be for
12 Helminthosporium control. This use estimate was obtained by extra-
13 polation from manufacturers' data, distributor sales, and individual
14 salesmen's data for given areas. The maneb volume is estimated at
15 390,000 lb., mancozeb at 230,000 lb., and zineb at 30,000 lb. used for
16 turfgrass. Most formulations are wettable powders containing 70-80%
17 a.i. and are applied as sprays with a water diluent.

18
19 The maneb and mancozeb products are highly effective against the
20 Helminthosporium diseases. They are the lowest cost fungicides avail-
21 able for the turf usage both in terms of price per pound as well as in
22 price per unit area of turfgrass treated. Treatment rates range from
23 4 to 8 oz. of formulated product per 1,000 sq. ft. for mancozeb, from
24 3 to 8 oz. for maneb, and 2 oz. per 1,000 sq. ft. for zineb (1, 10).

25 EBDC fungicide usage on turfgrasses will vary with the diseases
26 to be controlled, the geographic location, and weather situation.
27

1
2
3 Total number of EBDC applications in one growing season may range from
4 one to ten. It is not possible to compute a meaningful average for
5 either number of applications or dosage on a regional or nationwide
6 basis. Turfgrass disease control programs are influenced by numerous
7 factors such as turf quality standard to be maintained, pathogens and
8 diseases present, disease severity, temperature, rainfall and humid-
9 ity, grass variety and grass maintenance program. For the north-
10 eastern and midwestern U. S. the golf course use of EBDC materials
11 might consist of 1-3 treatments during April and May for Helmintho-
12 sporium diseases and 2-4 treatments in July and August for Rhizoc-
13 tonia, Pythium, and Helminthosporium.

14
15 Economic Losses from Turfgrass Diseases in the Absence of Satisfactory
16 Disease Control

17 Turf diseases result in loss of playing surface quality on golf
18 courses and athletic fields and in loss of satisfactory aesthetic
19 appearance of home lawns and other landscape grounds. The loss or
20 damage to landscape quality from turfgrass disease is difficult to
21 evaluate in monetary terms. The damage represents a detriment to the
22 satisfactions derived from home grounds and their care. Turfgrass
23 disease losses on athletic or recreational turfgrass areas such as
24 golf courses represent an economic monetary loss. Of greatest
25 significance is the potential disruption of the use of such
26 facilities.
27

1 The sports of golf, lawn bowling, grass court tennis, football
2 and others require a uniform grass playing surface. Turfgrass disease
3 with resultant play surface damage can and does result in loss of
4 clientele from golf courses, resort hotels and various vacation
5 complexes. In one instance in the 1970-72 period severe turfgrass
6 disease losses due to managerial incompetence at a New Jersey vacation
7 resort golf course resulted in a drastic drop in the volume of
8 business to the point of near bankruptcy (H. Cole, personal observa-
9 tion). In 1977 at a Pocono mountain resort, severe turfgrass disease
10 during a midsummer period resulted in decreased use of other resort
11 facilities and a drop in room occupancy rates (H. Cole).

12
13 It is difficult to ascertain whether the total volume of business
14 in a resort area decreases or whether redistribution to other loca-
15 tions occurs. It is believed that the situation may be analogous to
16 the absence of snow at ski resorts. Quality golf courses provide a
17 basis for the development of recreational businesses and employment of
18 large numbers of people in auxiliary enterprises.

19 Alternative to EBDC Fungicides

20
21 Effective alternatives to the EBDC compounds are available and
22 are used by turfgrass managers to varying extents depending on the
23 material and diseases to be controlled. The alternatives are from 2-5
24 times more costly than the EBDC materials when used at equivalent
25 rates to obtain similar levels of efficacy (Table 1)
26 (1,3,4,12,13,17,18).
27

Fungicide resistance to many of the currently available turfgrass fungicides is present in native populations of turfgrass fungal pathogens including Helminthosporium, Rhizoctonia and Sclerotinia. Fungicide resistance is believed to arise through natural mutation followed by fungicide selection pressure that allows the more resistant individuals in a population to survive and reproduce. Continuous use of a single fungicide allows a fungal population to be subjected to selection pressure in one direction. If one resistant individual is present in a population of several million or billions of individuals the fungicide selection pressure will competitively favor the resistant individual. Depending on reproductive rates after varying numbers of generations, the resistant individual will have become the predominant portion of the population to the exclusion of others. If various fungicides of different modes of action are used, the likelihood of resistance occurring is much reduced. Different fungicides may be used as combinations in tank mixes, in alternating schedules, or even in alternating years. Prevention of unidirectional shifts in pathogen population composition is the long-range goal in fungicide management (5,6,7,8,9,14,16,19,20).

The only way currently available to prevent development of fungicide resistance is through availability and use of as wide as possible an array of fungicides with different mechanisms of action. At present chlorothalonil (Daconil 2787®), Anilazine (Dyrene®), cycloheximide (Actidione®) are the only three other fungicides with a degree of activity against Helminthosporium. Fungicide resistance problems presently exist in control of this pathogen. The loss of

1 EBDC materials would accentuate fungicide resistance problems by
2 increasing selection pressure for survival of strains resistant to the
3 three alternatives (5).

4
5 Rhizoctonia is recognized for resistance selection. Alternative
6 registered products include benomyl (Tersan® 1991), Cyclo-
7 heximide-PCNB (Accidione RZ®), thiophanate methyl (Fungo®)
8 thiophanate ethyl (CL 3336®, Bromosan®, Spectro®), anili-
9 zine, (Dyrene®), Chlorothalonil (Daconil 2787®), thiram, and
10 mercury. Resistant strains are present for many of the alternative
11 materials. A large number of different fungicides should be main-
12 tained (H. Cole, unpublished data). Summer use of mercury fungicides
13 will be canceled with the end of the 1978 season. Benomyl, thio-
14 phanate methyl and ethyl, and PCNB have all been placed on RPAR noti-
15 fication. Hence, a situation which already has control problems would
16 be come even more severe if, or when, four more of the remaining mate-
17 rials would no longer be available.

18
19 Pythium is a variable fungus. The mancozeb and zineb products
20 can provide low cost suppression when used preventively and when used
21 incidently for control of other turfgrass diseases. Much of the maneb
22 and mancozeb treatments as used for Helminthosporium control also
23 provides a large measure of Pythium suppression. If these materials
24 are no longer available then far more numerous and more severe Pythium
25 outbreaks are anticipated. Alternate fungicides for Pythium control
26 are 3-5 times more costly than the EBDC's (Table 1). The three
27

1
2 presently available alternatives, chloroneb (Tersan sp.[®]),
3 ethazole (Koban[®]), and Dexon[®] are only effective against the
4 Pythium diseases and have no other turfgrass uses.

5
6 For further information in the fungicide resistance area the
7 reader is referred to "Symposium on Resistance of Plant Pathogens to
8 Chemicals," J. D. Gilpatrick, Chairman. Proc. Amer. Phytopathological
9 Soc. 3: 47-98. 1976.

10
11 Control of turfgrass disease is far more efficient when the user
12 can select from a variety of fungicides. This is true whether chemi-
13 cal application is the primary basis for a control program or an inte-
14 grated pest management approach is used. In fact it is even more
15 important to have a wide array of materials available for use with
16 integrated control programs. This allows the use of the one material
17 most compatible with the grass cultivars and ecosystem present at the
18 specific location. In addition it may be concluded that total
19 pesticide usage will be less when a larger number of different
20 materials are available than when only a single material can be used.
21 For example, if a number of different fungicides are available then a
22 specific material can be chosen which is most suited to the specific
23 pathogens, grasses, and environment in which they interact.
24
25
26
27

TABLE 1. Comparison of fungicide costs for EBDC materials vs. alternative products.

Fungicide product	Primary* Diseases Controlled	Dosage Range** in oz per 1,000 sq. ft.	List Price*** per oz to User	Cost per 1,000 sq. ft.
EBDC Materials				
Tersan LSR 80w	H, BP	3-8	8¢	24-64¢
Fore 80w, Mancozeb, M-45 80w,	H, BP, P	4-8	8-14¢	32-112¢
Dithane Z 78 75w	H, P	2	9¢	18¢
Alternative materials				
Daconil 6F & 75w	H, BP	206	22¢	44-132¢
Dyrene 50w	H, BP	4-6	18¢	72-108¢
Actidione RZ	H, BP	1-2	31¢	31-62¢
Tersan SP 65w	P	4	38¢	152¢
Koban 50w	P	4-8	66¢	264-528¢
Tersan 1991 50w	BP	2	61¢	122¢
Fungo 50w	BP	2	62¢	124¢
CL 3336 50w	BP	2	58¢	116¢
Thiram 75w	BP	3-6	13¢	39-78¢
Spectro	H, BP, P	3-4	29¢	87-116¢
Bromosan	BP	3-6	28¢	84-168¢
Dexon 35w	P	4-6	28¢	112-168¢

* H = Helminthosporium diseases

BP = Rhizoctonia Brown Patch

P = Pythium Blight

** from EPA registered labels

*** Average retail list prices - compiled by H. Cole, Jr., from current catalogue listings (see ref. 2)

1 Grass Seed

2
3 Grass establishment in the United States is accomplished mainly
4 through seeding. Grass seed is produced for planting of erosion
5 control, ground covers, home lawns, and recreational areas such as
6 athletic fields and golf courses. Other major purposes of grass seed
7 are for planting of pastures, rangelands, and forage and hay crops.
8 The large majority of turfgrass and other grass seed production is
9 concentrated in Washington and Oregon. It is estimated that 270,000
10 acres of grass seed production fields were maintained in Washington
11 and Oregon in 1977. Control of foliage, culm, and crown diseases is
12 crucial to successful seed production. It is estimated that 50,000
13 acres of bluegrasses and ryegrasses for grass seed production were
14 sprayed with the maneb and maneb plus nickel sulfate fungicides in
15 1977 for control of stem rust, strip rust, leaf rust (Puccinia sp.)
16 (11).
17

18 The maneb materials are formulated as wettable powders. Two to
19 four sprays per growing season may be applied depending on disease
20 severity. These are applied at the rate of 1.6 to 2.4 lb./acre of
21 active ingredient in 500-100 gallons of water/acre.
22

23 Economic Losses in the Absence of Satisfactory Disease Control

24
25 Diseases of seed production plantings result in reduced seed
26 yields. In addition to rust disease losses in the seed fields certain
27

1
2 other fungal diseases may occur. The full significance of these other
3 pathogens such as the Helminthosporium spp is not completely known.
4 Control of diseases in seed production fields may minimize the
5 necessity for future control of seed-borne diseases in the newly
6 established planting. In this manner, fungicide use in seed fields
7 may result in lesser total fungicide use than if the plantings were
8 established with diseased seed or seed bearing pathogen propagules.

9
10 In 1976 and 1977 in Washington and Oregon, grass seed yields
11 ranged from 400-1000 lb./acre where maneb treatments were applied.
12 Without maneb, seed yields were 100-300 lb./acre (11, Dr. John R.
13 Hardison); the rust diseases were primarily responsible for these
14 losses.

15 Alternative Control Practices and Fungicides

16

17
18 The basic disease control practice for several decades had been
19 open burning of residual straw, stubble, and debris after seed harvest-
20 to eliminate survival and buildup of disease organisms including poten-
21 tial seed borne pathogens. The advent of environmental legislation
22 regarding air pollution from smoke and combustion odors is gradually
23 eliminating burning as a disease control practice. The alternative to
24 after-harvest burning is the use of fungicides at regular intervals
25 during the production season. Seed growers are shifting towards
26 fungicide use. The EBDC fungicides represent the only economically
27 feasible fungicides for Helminthosporium and other fungi normally

1 controlled by open burning. In addition to the disease situation
2 induced by the prohibition against burning crop residues there are
3 rust diseases which cause severe losses in yield whether burning
4 is practiced or not. When rust diseases occur, the maneb and maneb
5 plus nickle sulfate fungicides are used for rust control in addition
6 to burning. Assuming an average seed price to growers of 40¢/lb. and
7 production costs of \$170.00/acre average it can readily be seen that
8 growers must produce 425 lb. of seed/acre to break even. Without the
9 use of maneb the seed crop cannot be profitably produced in areas with
10 foliar disease problems. As the use of open burning of stubble
11 residue declines it is anticipated that the demand for maneb for
12 foliar disease control of seed production plantings will increase.

13
14 Literature Cited

- 15
16
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Forestry

The EBDC fungicides include the six fungicides: amobam,
mancozeb, maneb, nabam, metiram (Polyram), and zineb. All of these
except amobam and metiram are registered for use on forest products.

The average individual would probably assume that a fungicide
registered for use on a particular tree species would be used on vast
forested acreages for control of a particular disease. The forest
industry, however, does not consider it economically feasible to apply
protectant fungicides to forest stands. Consequently, the bulk of
EBDC fungicides used by the forest industry are applied to products
other than forest stands.

The largest quantity of EBDC fungicide used on a forest product
is formulated in slimicides and used by the pulp and paper industry.

The 690 pulp and papers mills in the United States produce 48.4
million tons of pulp per year and apply 8,000 tons a.i. of slimicide

1 each year to control slime (primarily bacteria and fungi) in the wet
2 end of their mills. If all slimicides used were those that contain
3 nabam, approximately 600 to 2,000 tons of nabam would be used annually
4 by U. S. pulp and paper mills.

5
6 Although some mills have discontinued the use of EBDC containing
7 slimicides, others continue to use such materials. The actual quan-
8 tities of nabam used by pulp and paper mills are considered to be a
9 trade secret and consequently, there are no reports of the quantity
10 used. Alternate slimicide formulations that do not contain nabam are
11 either more expensive or are less effective. If those formulations
12 were used exclusively there would be an increased cost of pulp and
13 paper products to the American consumer. Although there are 45
14 chemicals registered for use in slimicide formulations, a total ban of
15 EBDC-containing slimicides would, undoubtedly, lead to a build up of
16 slime resistant to the alternate slimicide and create a greater need
17 for research and development of new slimicides ingredients. This
18 would cause an increase in the price of paper even if no new
19 slimicides were developed.

20 The average pulp and paper mill purges about 30 million gallons
21 of water effluent from its system each day and replenishes with fresh
22 water. Slimicide is added daily as good manufacturing practice de-
23 mands. Some mills use more slimicide than others because they follow
24 the toxin rather than the biochem method of slime control. The latter
25 method allows some slime to build up in the system which reduces the
26 amount of extractives in the water effluent but the reduced slimicide
27

1 cost may offset the loss of extractives. The chemical industry of the
2 United States obtains large quantities of chemical extractives from
3 pulp and paper mill effluents and, consequently, this industry is
4 dependent upon quality control within mill effluents. A ban of EBDC-
5 containing slimicides would change the quality of slime in effluents)
6 (dependent upon which alternate slimicide were used) and alter the
7 quality and quantity of extractives in effluents. Such changes could
8 be devastating to chemical plants if the extractives on which their
9 livelihood depended were removed or degraded by the microorganisms
10 within slime.

11
12 Maneb and mancozeb are used to control needle cast of Christmas
13 tree plantings in several lake states including Michigan and Wisconsin.
14 Christmas tree growers in 17 states reported the use of Maneb or
15 Mancozeb on 10,000 acres of Christmas trees valued at \$35,000,000.
16 This amounts to 2.2% of the 450,000 acres of Christmas trees in the
17 United States actually sprayed with an EBDC fungicide. The Christmas
18 tree industry uses about 15,000 lb of maneb each year. This information
19 is based on an assumed average of 400 trees per acre sprayed with
20 an average volume of one quart/tree/application and 10 applications
21 per year with 1-1/2 lb. maneb per 100 gallons. Bravo is a registered
22 substitute fungicide but it cost about 3 times that of maneb. A ban
23 of EBDC fungicides would increase the cost of Christmas tree
24 production approximately \$3.60 per acre, but the quality of the trees
25 produced with the alternate fungicide would be reduced and further
26 decrease the value of the final product. A reduced value of \$1/tree
27

1 would consequently increase the cost of Christmas tree production
2 approximately \$404/acre.
3

4 A very small amount of maneb is used to control herpobasidium
5 blight of honeysuckle in wind barrier plantings in the Plains states
6 (8 lb./year; 4 applications/year) and a minor amount of EBDC fungi-
7 cides (maneb, zineb, mancozeb) is used in forest tree nurseries
8 to control a number of foliar diseases on several tree species.
9 Thirty-seven nurseries in 17 northern states reported the use of maneb
10 to control needle cast of pine species. Maneb is used in numerous
11 nurseries throughout the United States to control anthracnose and leaf
12 spot diseases of several hardwood species. There are 190 forest tree
13 nurseries in the United States which have 9,209 acres of land avail-
14 able for seedling production. Regeneration of all forest tree species
15 is dependent upon seedlings produced in these 190 nurseries and if a
16 fungicide is not registered or available for use in a particular
17 nursery during a critical time interval of a month or two, an entire
18 tree species may be lost for reforestation purposes leaving hundreds
19 of acres of forest land denuded for the additional twelve months
20 needed to produce the next year's seedling crop. Such idle acres
21 would probably need additional site preparation to control weeds.
22 Such additional expense would magnify in the forest product economic
23 chain: the land owner would pass the increased cost to the buyer, the
24 buyer would sell the lumber, pulp, paper, etc., to the manufacturer at
25 a higher cost, the manufacturer would sell to the wholesale
26 distributor at a higher cost, and the consumer would ultimately absorb
27 the several mark ups. Although there are 9,209 acres in forest tree

1
2 nurseries on which trees may be grown, less than half that acreage is
3 planted to seedlings each year. Assuming a need for 10 sprays each
4 year on 4,000 acres of seedlings would create a market for 6,000 lbs
5 of maneb per year at a cost of \$10,200. A substitute fungicide
6 costing 3 times that of maneb would create a market for \$30,600 of the
7 other fungicide (a net increase of \$5.10/acre of seedlings).

8
9 Thus, the impact of a ban of all EBDC fungicides in the United
10 States would add to the nation's spiraling inflation rate principally
11 through an increased cost in paper and other products derived from
12 pulp and paper mills. Christmas tree and nursery seedling crops would
13 not be seriously damaged by such a ban of EBDC fungicides unless the
14 substitute fungicides were also banned. A ban of all fungicides for
15 use on all forest products would seriously cripple our nation. A lack
16 of slime control in paper mills would essentially curtail the
17 production of all paper products.

18
19 The risk of use of EBDC fungicides on forest products must be
20 considered minimal if any real risk exists at all. EBDC fungicide
21 residues degrade rapidly in the environment, do not magnify in the
22 food chain, and do not accumulate in water, soil, air, plants, or
23 animals. Their use on forest products seldom contact food or feed and
24 the tolerance of 3 ppm on paper products contacting food should rarely
25 be reached or exceeded.
26
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